

Brussels, August 22, 2018

Ms. or Mr. European Ombudsman
1, avenue du Président Robert Schuman
CS 30403
F-67001 Starsbourg Cedex

Re: Public Consultation – The use of languages in the EU
Institutions, bodies, offices and agencies



Médiateur européen

27 AOUT 2018

Date d'arrivée

Dear Ms. or Mr. Ombudsman,

I received an email from the EU asking how I could contribute to the use of languages in the institutions of the EU. It so happens that Juan Moreno-Ternero, [REDACTED] economist and professor at Universidad Pablo de Olavide, Sevilla, and myself, economist and professor at Université Libre de Bruxelles, just wrote a paper on this issue, which might be of some interest to you.

In this paper, we discuss compensation schemes (paid out from a specific EU budget, comparable to the Erasmus project) that should give incentives to EU countries and citizens to acquire a *lingua franca*. We consider three possible candidate languages: English, French and German, which are already the most widely spoken languages, but the calculations could be made for any other language, though the cost would be larger because they are less used, but perhaps also less “marked.”

We assume that countries can claim compensations linked to the number of (young) citizens who do not speak a given candidate language, and the distance between the official language in the country and the suggested *lingua franca*, a measure which takes account of the difficulty to learn a candidate language if you do not know it. This would ensure that, in the long-run, every EU citizen would be proficient in her/his native language as well as in a *lingua franca*, which would ensure communication and better individual contacts between EU citizens. The idea is based on a survey that the EU carried out in 2006 (Special Eurobarometer) which is described in the paper as well (pp. 1776-77), and leads to the fact that 83% of the EU population would be happy to share a common language.

We study two sharing schemes that are rooted in ancient sources, and are therefore not “cooked up” just for this case:

- (a) the Aristotelian *proportional* rule. This is standard, since it simply distributes the total subsidy that would be at the disposition of the EU in proportion to those who do not know the candidate language, corrected for its distance from the native language. This rule prevents coalitional manipulations among countries.

(b) the *Talmud* rule, which is a little more complicated, but still easy to use. It guarantees meaningful lower bounds in the sharing process for all countries.

I append a copy of the paper for your perusal, and hope that you will have some time to have a look at it. My colleague Juan Moreno-Tertero and I would of course be available to discuss this issue with you.

Sincerely yours,


Victor Ginsburgh
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Response by [REDACTED]

1. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Since the EU is committed to the principle of *linguistic diversity*, much more use of languages other than English should be made in communications with the general public. For instance when a Commissioner informs journalists and the wider world about a policy or decision, speaking English is fine for some but not for others. Speaking English with less than optimal proficiency, which is often the case, is indefensible. It creates the impression that English is the only language that matters, rather than confirming diversity and the formal equality of the 24 languages. As well as the *efficiency* variable, the *symbolic* value of using other languages than English is important. Technological solutions so that all 24 languages are used, with interpretation or sub-titles ought to be developed and used.

What happens in the internal operations within the Commission or other bodies, the use of 2-3 *procedural* languages is defensible, and a separate question.

The problem with the central criterion of *relevance* is that it is *vague*, with the consequence that it is open to many interpretations and to abuse.

The EU is constitutionally committed to '*respecting*' linguistic diversity, and does so for some purposes (publishing Eurolaw and directives, providing full interpretation in certain contexts, etc.). However *respect* does not provide an actionable right for which there is an identifiable duty-holder. United Nations human rights principles assume that state authorities have threefold obligations: a duty to respect, a duty to protect, and a duty to fulfill¹. In many contexts the EU fails to '*respect*' the principle of maintaining linguistic diversity to which it is committed.

In the EU's worldwide activity, its *external relations* in speech and writing, the tendency is to use exclusively English. The European Parliament has stipulated that external communications should be in a variety of languages, but this does not happen. Here too the EU sets a bad example.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

There ought to be *guidelines* for new Commissioners, new MEPs, and for all civil servants and experts attending meetings on

- (1) principles for the optimal use of the interpretation services, and advice on using them;
- (2) clarification of when and why full 24 interpretation may not be available;
- (3) principles for when and why a limited number of language versions (translations of documents) have been made available.

The production of such guidelines should build on the experience of EU employees. Interpreters from Denmark have informed me that their nationals (*experts, civil servants, ministers*) who believe that their English is good are frequently misguided, and fail to function convincingly or defend national interests well. This is anecdotal evidence but a serious investigation of the issue, for all official languages, could be revealing.

Journalists often write as though there are only three working languages in the EU. They seem to be ignorant of the distinction between procedural languages, that are a necessity in the internal workings of institutions, and the reality of 24 working and official languages for a wide range of other purposes. There is a need for more information and awareness.

It should be possible to have an *appeal procedure* in cases where fewer than 24 languages are used in communications of general interest., and citizens without competence in the language used feel marginalized. A citizen ought to be able to respond with a demand that a particular language should be used.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request?

Definitely.

If so, how can that policy be framed in order to avoid disproportionate costs?

The issue of the costs for translation and interpretation needs to be re-thought. Since there is incontrovertible evidence of a large proportion of EU citizens having no faith in the EU, one way of countering this particular 'democratic deficit' would be to use all of the 24 languages more, and *increase the budget proportionately*.

Related to this consideration is the fact that a lot of the *documents* generated by the EU are *specialized, technical, and unreadable* except by a limited number of people. A recent study of the way representatives of the Commission use social media, Twitter in particular (nearly all the Twitter examples cited were in English, a few in French), to communicate with the public concludes that the EU engages in one-way communication. It provides orientation for the outside world that tends to be self-congratulatory, and geared towards organisations, journalists and people who are favourably disposed to the EU project. More dialogic communication with citizens is non-existent, which confirms a belief that the EU is remote and cut off from the concerns of ordinary people, which intensifies disaffection with the EU. Here follows a quote from the research:

“The above points to the fact that, even if modernised somewhat by the use of Twitter and other social/online media, EU politico-organizational communication still unfortunately falls short of playing a vital role in effectively politicizing EU institutions. Even if it is deploying social/online media, the EU is still not fully able to open its key institutions up to the wider EU public and, by breaking out from elite networks, to forge a public dialogue and increase the EU’s political legitimacy through an array of communicative practices that would help to decrease Eurosceptic moods and attitudes.”²

A separate issue, that confirms the remoteness of the EU from the general public, is that serious damage to the EU’s reputation was done in *negotiations for membership* of all post-communist countries because of the requirement that all key documents should be in English, and take priority over any texts in a national language. This policy in part explains why well-informed people in the Baltic and central European countries experienced that their languages were treated as second-class. Whether they still do, and why, ought to be analysed.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The Ombud determined many years ago that the *website of presidencies* should operate in all 24 languages, for instance when the priorities for each half year are announced. This has never been acted on but should be enforced.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Definitely, in language that is comprehensible to the general public. What complicates this fundamental problem is that since its inception in 1958 there have been major disagreements on the goals (federalism or a union of states) and a general lack of openness about overall goals. The structural weaknesses of the euro, with catastrophic consequences for some countries since 2008, were concealed when it was launched, but are now clearer.

Some of the *federalist rhetoric generated by the European Commission is comic*, for instance the thrust in 2018 to create ‘a European educational space’, following on many years of the Bologna process creating a ‘European higher education space’. These labels are a clear case of creeping federalism that many citizens in EU member states do not identify with. They misuse the concept ‘European’, as though the EU patents the term and can claim all the credit for its use. In the case of research, scholarship, religion, knowledge, finance and writing in Europe of all kinds, activity for centuries has been international, and predates the nationalism of the past two centuries. EU rhetoric therefore tends to be blinkered, ignorant of history, and counter-productive.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for

example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

For a limited number of issues one could possibly select one language from the main linguistic families – Finno-Ugric, Germanic, Romance, Slavic – but this is unhelpful, since few people are proficient in more than one language in each group, so this discriminates unfairly. As do all other limitations.

The one criterion that can be applicable would be *topic*. *Finance* operates to a large extent in English, at least internationally. One can therefore conclude that consultations can be announced in English, but then responses, in speech or writing, could be in any official language.

Scholarly research takes place in many languages. It is therefore incorrect to act as though English is ‘the language of research’, which the Commission and some experts do. There are many languages of research, its generation, communication in lecturing, and in publications. Careless terminology strengthens the hegemony of English at the expense of other languages.

When the *DG for Research and Innovation* states that applications for Horizon 2020 funding can be submitted in any of the 24 languages, but that if any language other than English is used, applicants are invited to accompany their application (often 100 pages) with a translation into English. This ‘advice’ means that research groups in many countries that use a Romance language (e.g. French or Spanish) or Slavic languages as their primary academic language are discriminated against. Applicants are not treated equally.

I also know from a decade of years of experience as an expert for the DG that the *evaluation process*, orally and in writing, initially at a distance and later in Brussels, takes place exclusively in English. For many experts, English is not their primary professional language. This impacts negatively on the efficiency of the evaluation process.

This DG, and probably others, should therefore not function exclusively in English of varying quality, but operate with more linguistically diverse language policies, however complicated this is, if they are to ensure greater fairness in the application process and more efficiency in the assessment process. A fundamental weakness in the system is that Eurocrats in the DG are generalists without specialist familiarity with research in the many areas that they deal with. According to an eminent but rather morbid researcher into EU affairs, this weakness in the Commission applies to all DGs (John Gillingham, *The EU: An obituary*, Verso 2018).

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made

available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”.

Yes, and in addition, the *reasons taken by the Commission* for acting or not acting on recommendations should be made public. This would strengthen the accountability of the Commission. The need for this is shown by a revealing comment by Jean-Claude Juncker on how the EU works that was reported in *The Economist*, and cited by Chris Patten, EU commissioner for the UK 1999-2004, in his 2005 autobiography. Juncker stated:

We decide on something, leave it lying around, and wait and see what happens. If no-one kicks up a fuss, because most people do not know what has been decided, we continue step by step until there is no turning back.

DGs are seldom *open and accountable*, as the following example shows. The DG for Education and Culture commissioned an evaluation of some language policy issues, at the request of the European Parliament. The task was given to a consultancy with wide experience of servicing EU institutions. Their mandate excluded attention to the internal workings of EU institutions and migrant languages. Their detailed (118 pp.) study, of 18 May 2005, drew on extensive consultation with a wide range of people concerned with many aspects of language policy, and was made available on the DG’s website. It analyses needs, conditions, and modalities, and confirms that a wealth of professional expertise exists that decision-makers ought to draw on. It makes a strong case for either a Linguistic Agency, like other high-prestige EU agencies (dealing for instance with the Environment in Copenhagen, and Fundamental Rights in Vienna), or alternatively a network of Language Diversity Centres to strengthen policy formation and implementation, particularly for regional minority languages. The study reveals a widespread perception that there is a serious need for policy advice and information for national and EU decision-makers. This was overwhelmingly the case in new member states, whereas the established ones considered such functions ‘not useful’. There was also near unanimity in responses in rejecting English as a sole *lingua franca*. The study concludes that ‘A no-action scenario would seriously undermine the credibility of the EU in this field’.

In fact the Linguistic Agency proposal was *rejected unilaterally* by the Commission. It is impossible to know on what grounds, but if an agency had been established, there would necessarily have been a reduction of the freedom of manoeuvre of the Commission and its ability to determine language policy overtly in ‘actions’, and covertly through *laissez faire*. For which it may well not be well qualified.

This example appears to have strong similarities to the experience of the European Union’s *Chief Scientific Advisor* from 2012 to 2014, Ann Glover. The European Commission’s political and economic agenda often conflicted with the scholarly evidence submitted to it. Glover noted that in several high-profile

policy areas, evidence was manipulated, and scholarly input was subordinated to political goals; facts were “twisted” (reported on www.euractiv.com on 27 May 2014). The post of EU Chief Scientific Advisor was later abolished by Jean-Claude Juncker, presumably with no justification for the decision being given. Again, no accountability.

Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

My earlier responses clarify my assessment of these questions.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958^[7] when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

I would recommend the creation of a *Code of Conduct in the Management of Multilingualism*. This was one of the many recommendations that I made in the concluding chapter of my book *English-only Europe. Challenging language policy* (Routledge 2003)³ that would address all significant challenges raised by the Ombud’s investigation of language use. This would be advisory rather than hard or soft law.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

By savings in the CAP and regional funding. Relatively speaking, the cost of interpretation and translation is modest compared with many other costs, and would represent a good investment in top-down and bottom-up communication. It would also be a contribution to greater democratic openness and accountability.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that “machine” translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

I assume the institutions have enough experience of this to know the strengths and weaknesses of this for a wide range of textual tasks.

¹ United Nations, Office of the Human Rights High Commissioner 2018. *Human rights and constitution making*. New York and Geneva.

² Krzyżanowski, Michał. 2018. Social media in/and the politics of the European Union. Politico-organizational communication, institutional cultures and self-inflicted elitism. *Journal of Language and Politics* 17/2, 281–304.

³ I wrote this book aiming at the general reader, as well as EU employees, but I suspect that it in fact has mainly been read by academics. It makes a strong case for the maintenance of linguistic diversity. The book includes a recommendation by the then Vice-President of the European Commission, Neil Kinnock.



Médiateur européen

- 1 OCT. 2018

Date d'arrivée

European Ombudsman
1 avenue du Président Robert Schuman CS 30403
F - 67001 Strasbourg Cedex
France

Barcelona, 25th September 2018

Subject: 'language consultation - SI/98/2018/TE

Dear Ms. O'Reilly,

Plataforma per la Llengua is a non-profit organization based in Barcelona working to promote the Catalan language as a tool for social cohesion in the entire Catalan-speaking area, which includes North-eastern Spain (Catalonia, Valencia, Balearic Islands and Eastern Strip of Aragon), South-eastern France (Eastern Pyrenees Department), the city of Alghero in Sardinia (Italy) and the independent Principality of Andorra. We have been in existence for 25 years, we have more than 17,000 members, and we participate in three international networks of organizations devoted to defending and promoting the linguistic rights of national minorities, namely, ELEN (European Language Equality Network), NPLD (Network for the Promotion of Language Diversity) and FUEN (Federal Union of European Nationalities).

We noted that your office started a consultation on the use of the EU official languages by the EU institutions when communicating with the public. We know that there is a detailed form where specific questions are asked concerning concrete aspects of the use of these languages; nevertheless, we think it is more convenient that we write a separate letter because we would like to shift the focus towards the case of Catalan, which goes beyond the scope of this consultation.

Catalan, which has over 10 million speakers, is the 14th most widely spoken language in the EU; however, Catalan does not hold official status in the EU. As a consequence, the Catalan language is currently placed under an exceptional legal framework at EU level, since Catalan is by far the largest non-official EU language.

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**L'ONG
del català**

Such an anomalous status was highlighted in 1990 by the European Parliament, which called on the Council and the Commission *“to take whatever steps necessary to achieve the following objectives: the publication in Catalan of the Union’s treaties and basic texts; the use of Catalan for disseminating public information concerning the European institutions in all media; the inclusion of Catalan in the programs set up by the Commission for learning the European languages; the use of Catalan by the Commission’s offices in its written and oral dealings with the public in the Autonomous Regions in question* (Point 4 of Resolution A3-169/90 of the European Parliament).

We would like to shed light on the main tangible consequences that the non-official status of Catalan in the EU entails for Catalan-speaking citizens:

-Catalan cannot be used in the European Parliament by representatives elected in the Catalan-speaking areas, either spoken or written.

-Catalan cannot be used in the written communications with the EU institutions, despite the provisions of Resolution A3-169/90 with regards to this issue. Only residents in the Spanish State can indirectly do so through a very complicated procedure involving multiple translations with no guarantee of getting a reply in Catalan. This procedure is regulated by a set of bilateral agreements between Spain and six EU institutions – European Commission, EU Council, EU Court of Justice, EU Ombudsman, which were signed in 2006 (Administrative Agreement 2006/C 73/06 and following). According to the agreements, citizens’ letters have to be translated by a Spanish State body which needs to be determined by the State itself. The problem is that the established procedure is such complex that the agreements lead to wrongly believe that citizens can send their communications directly to the EU institutions; furthermore, Spain has established that its Permanent Representation before the EU is the body responsible for receiving and translating citizens’ letters, but this information is not available on any public website.

-Certain linguistic rights recognized in the Catalan legislation are limited by EU law, as it is notably the case of laws concerning the use of the Catalan language in food products labelling. This is due to the fact that Regulation 1169/2011 of the European Parliament and the Council only guarantees labelling in EU official languages. Article 15.2 of this Regulation states that *“within their own territory, the Member States in which a food is marketed may stipulate that the particulars shall be given in one or more languages from among the official languages of the Union.”* The drafting of this article may hinder the implementation of article 128-1 of Consumption Code of Catalonia, which establishes that the information regarding the consumption of goods has to be presented in Catalan.

We know that the current anomalous legal situation of the Catalan language in the EU can only be addressed by achieving full official status, and that this can only happen if the Spanish government makes a formal request to the European Council, as it stated in Ruling 1/1958. Nevertheless, while this does not happen we believe that it could be useful that the EU ombudsman express its support to a number of actions that would improve the linguistic rights of Catalan speakers within the current EU legal framework:

-Call on the European Parliament to allow the oral use of Catalan. Since there are a high number of Spanish language interpreters who are also fluent in Catalan, it would be possible to implement this measure with almost no cost for the institution. Besides, article 158 of the Rules of Procedure of the European Parliament obliges to guarantee the oral use of EU official languages, but does not impede to use member state co-official languages when possible. Therefore, it is important to stress that there is technical and legal capacity to implement this measure despite the non-official status of Catalan in the EU and that there is no need for a formal petition of the Spanish government to do so.

-Call on the EU institutions and the Spanish government to modify the bilateral agreements 2006/C 73/06 and following in order to guarantee that citizens can send their communications in Catalan directly to the concerned institution. The institution which receives the letter should send the letter to the Permanent Representation of Spain before the EU so that this body translates the citizens' letter as well as the answer of the EU institution to the citizen.

-Call on the EU institutions taking part in the ordinary legislative procedure to draft EU legal acts in a way that takes into account non-official EU languages, especially with regards to guaranteeing that these languages are not excluded by explicit mentions to use EU official languages only in areas regulated by these legal acts. Calling on the European Commission to amend Regulation 1169/2011 in order to modify the drafting of Article 15.2 would be the most effective step to be taken.

As you can see, all of these measures could be implemented within the current EU legal framework if there is political will on the part of EU institutions to do so.

On the other hand, we consider it is important that this consultation includes insight on the use of EU non-official languages, as it is the case for Catalan. We agree with the fact that there is a need for clarification of the implementation of multilingualism in the daily functioning of EU institutions, but we also believe that EU institutions should consider the neglected linguistic rights of 50 million citizens who speak EU non-official languages. This is especially important with regards to Catalan, because as we previously pointed out there is no other language spoken by 10 million people not holding official status in the EU. As long as official status cannot be achieved through the established legal means, EU institutions have to consider the recognition of the minimal linguistic rights that can be implemented within the current EU legal framework, like the ones we point out in this letter.

With regards to the other non-official EU languages, it is worth reminding that the European petition campaign for the Minority Safepack Initiative (in which Plataforma per la Llengua took part) was a success, gathering 1,128,385 validated statements of support and reaching the threshold in eleven Member States (Romania, Slovakia, Hungary, Latvia, Spain, Croatia, Denmark, Bulgaria, Slovenia, Lithuania and Italy). The Minority Safepack Initiative includes nine proposals:

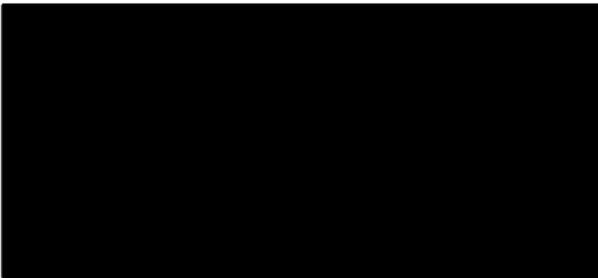
1. EU-Recommendation for the protection and promotion of cultural and linguistic diversity.
2. Funding programmes for small linguistic communities.



3. The creation of a Language Diversity Centre.
4. The objective of EU's regional development funds to include the protection of national minorities and the promotion of cultural and linguistic diversity.
5. Research about the added value of minorities to our societies and Europe.
6. Approximating equality for stateless minorities e.g. Roma
7. A single European copyright law, so that services and broadcast can be enjoyed in mother tongue.
8. Freedom of service and reception of audio-visual content in the minority regions.
9. Block exemption of regional (state) support for minority culture, media and cultural heritage conservation.

We believe that your public support for these measures, both the specific ones for the Catalan language and the proposals related to the Minority Safepack Initiative, would incentive EU institutions to take into account our petitions in the EU decision-making process. Indeed, we stay at your disposition for any clarification on this issue.

Best regards,



Òscar Escuder
President



From: [REDACTED]
Sent: 30 September 2018 17:26
To: Euro-Ombudsman
Subject: [EOWEB] Language consultation - SI/98/2018/TE

Follow Up Flag: [REDACTED]
Flag Status: Flagged

Sender

Sender [REDACTED]
To The European Ombudsman
Date Sunday, September 30, 2018 05:25:54
About [EOWEB] Language consultation - SI/98/2018/TE

Your data

Part 1 - Contact information

First name
Surname
Gender
E-mail address



Language you would like to receive an answer in en - English

Part 2 - Data

To The European Ombudsman
Subject Language consultation - SI/98/2018/TE
Dear madams and sirs,

I would like to submit an answer to the first question of your consultation questionnaire on the use of languages by the EU ("1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?")

Here is my answer:

Content Non-legislative acts (Art. 290 & 291 TFEU) are increasingly important regarding the real scope of newly adopted EU legislation.

While these acts get translated in all EU languages after their adoption by the Commission, some EU agencies / specialised authorities charged with drafting them conduct extensive consultations on them and deliver their final proposals to the Commission in one language only, English. As noted in table 6.3 of the appendix of the study "European Strategy for Multilingualism" (p. 62) quoted in your background note for the present consultation, only 37% of EU citizens above the age of 15 have some knowledge of this language. The big majority of EU citizens are therefore excluded from any interaction with the work these EU agencies conduct in their name and fund with their taxes. The scope of EU legislation which applies to all citizens and/or impacts their lives depends on the work of these EU agencies but the majority of citizens is de facto banned from following their work

The European Securities and Markets Authority based in Paris constitutes such an example. All information in their website including their final proposals to the Commission (draft RTS or ITS as for example in this document from p. 20 https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1006-_mifid_ii_final_report_on_mifid_ip_technical_standards.pdf) are in English only.

Article 73 of the Regulation (EU) No 1095/2010 creating ESMA states that:

"1. Council Regulation No 1 [OJ 17, 6.10.1958, p. 385] determining the languages to be used by the European Economic Community shall apply to the Authority.

2. The Management Board shall decide on the internal language arrangements for the Authority."

The latest consolidated version (2007) of Council Regulation No1 includes Article 4 stating: "Regulations and other documents of general application shall be drafted in the official languages" <https://publications.europa.eu/en/publication-detail/-/publication/e27878a8-d455-4515-8e18-99bf6160b651/language-en>

Draft RTS and ITS cannot be seen as documents covered by ESMA's "internal language arrangements" (as stressed in 1095/2010) but rather as "other documents of general application" (as stressed in Council Regulation No 1).

Therefore, in line with existing legislation, RTS and ITS proposals forwarded by EU agencies / specialised authorities to the Commission should always be translated in all official EU languages so that citizens can scrutinise the work of these EU agencies / specialised authorities.

Sincerely your,

[Redacted signature]

[Redacted contact information]

From: [REDACTED]
Sent: 30 September 2018 20:15
To: Euro-Ombudsman
Subject: [EOWEB] Use of languages in EU institutions and websites

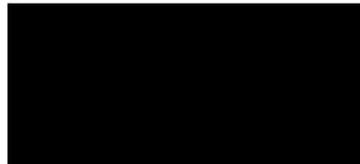
Sender

Sender [REDACTED]
To The European Ombudsman
Date Sunday, September 30, 2018 08:14:58
About [EOWEB] Use of languages in EU institutions and websites

Your data

Part 1 - Contact information

First name
Surname
Gender
E-mail address



Language you would like to receive an answer in en - English

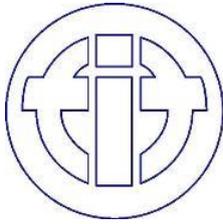
Part 2 - Data

To The European Ombudsman
Subject Use of languages in EU institutions and websites

Content With the EU commitment to linguistic diversity it is important that all languages recognised by the CoE Charter for Minority or Regional Languages should have some presence within the institutions and at very least a section on the websites. We feel that the EU is failing to fulfill the commitment to diversity by using these languages even to a small extent. This would give them the exposure and dignity they deserve and require. The EU should encourage member states to honour their commitments under the CoE Charter to give 'robust support' to our minority languages. This ought to include the commitment to adequate funding and the access to state media. For too long member states have got away with ignoring an important part of European culture and the EU, other than giving initial funding after 'recognition', has failed to follow up on this. Member states should be expected to do more than pay lip service to linguistic diversity.

In the case of Cornish, following recognition in 2005 and initial funding for 3 years from the EU, the UK government has steadily reduced funding and finally stopped it all together in 2016. All that has been achieved over those 11 years is now in jeopardy. We appeal to the EU to take a much more supportive approach to this problem.

[REDACTED], Kesva an Taves Kernewek / Cornish Language Board.



FIT EUROPE

REGIONAL CENTRE EUROPE OF THE

INTERNATIONAL FEDERATION OF TRANSLATORS

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30 September 2018

**Public Consultation on the use of language in the
EU institutions, bodies, offices and agencies**

- 1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?**

Most of the questions in the survey consist of various sub-questions. We consider it more appropriate to answer the individual questions in responding to the numbered questions in this survey.

a. What languages are to be used in particular contexts?

The default situation should be to provide as much information as is possible (and necessary in a given context) in each official language, especially so for public-facing content. The reality is, many citizens of the EU do not speak English, French or German to an extent that would allow them to fully participate in the EU project, despite what various studies would have us believe.

Quite apart from that, the right to information in one's own language has been a fundamental principle of how the Communities have operated from the very outset.

Language is a vital component of each Member States's identity. Especially for languages of lesser diffusion, it is vital to maintain and promote use of those languages. It might be useful to conduct studies on how those who speak languages of lesser diffusion react to not being able to access information in their own language. A sense that the Union adds something to, and is an additional layer on top of national culture, could be undermined if the number of languages in which citizens can interact with, and obtain information from the EU institutions and agencies is limited.

Moreover, investment in language and translation generates multiple benefits and operates as a multiplier in the economy (see *Linguanomics*, Hogan-Brun).

To use the well known quote "The language of Europe is the language of translation".

b. If there are gaps how can they be addressed?

We have already suggested an in-depth study on the emotional impact of moving away from a complete commitment to multilingualism. It is our impression that abandoning multilingualism on a large scale would undermine support for the Union among its citizens.

An in-depth study could also be done on what information is necessary in which languages for which parts of society so that decisions can be more evidence-based. Cost cannot be the sole criterion in decision-making. For example, as is already the case, most cases from the CJEU shouldn't have to be translated into all official languages, just the language(s) of the Member State(s) involved in a given case.

c. What criteria should be used?

Any criteria should always aim to enable the maximum inclusion of citizens, in whatever area of their lives that involves. The general criterion should be that documentation intended for external purposes should be translated into all languages.

We understand that for internal purposes, other approaches such as intercomprehension within language families could reduce administrative costs, but such practices should not be extended to the public.

We believe that any criteria developed should apply in a uniform manner across all EU institutions and agencies to promote sound administration and legal certainty for citizens.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

a. Should EU institutions have a language policy

Yes, there should be a language policy. We would suggest one general language policy for all EU institutions and agencies with additional information (perhaps in the form of Annexes) relevant to the work/content of each institution/agency. It might save time and work involved in actually producing a policy because it would be done once and effort would not be replicated.

b. What should be in it?

Any policy should ensure that citizens of the EU have the opportunity to be fully involved in the workings of the EU their own language. The importance of national languages and of translation, as essential to the European project, should be clearly stated.

We shouldn't be paying lip service to linguistic diversity. The EU affects all areas of our citizens' lives and the approach to the provision of information in all languages should reflect this.

c. Should it be published on the website?

Yes, it should be published so that anyone who wishes to, can access it.

d. If there are restrictions on the number of languages, how detailed should the restrictions be?

If there are restrictions they should be realistic but pragmatic. Cost cannot be the sole, or main, factor. Language is too integral to the EU for that.

Any restrictions should be very detailed and clear reasons for the restrictions should be provided. It might be useful to perform a cost-benefit analysis in relation to any proposed restrictions. It would also be useful to provide clear examples to situations in which the restrictions apply and the justifications for them.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

a. should there be a policy of making TR documents available on request?

If this would involve EU citizens paying to access information that should be available to them by right, then no, the institutions/agencies should not have a policy of providing documents on request.

b. how can one avoid disproportionate costs here?

How can the provision of information for EU citizens in their own language be discussed in connection with disproportionate costs?

Once again: the Language of Europe is the language of translation.

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

a. What general language principles should apply to the websites of EU institutions?

Unable to respond as the meaning of this question is unclear.

b. Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The websites are the main source of information about the EU and the main point of contact for EU citizens with the institutions of the EU.

Therefore, all websites should be available in all of the official languages of the EU. Anything less would be a disservice to the citizens of the EU and, once again, put us in danger of paying lip service to our linguistic diversity.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

If the issues are key, then summaries are not sufficient.

Summaries are problematic because it all depends on the ability of the person doing the summary to identify what is important. How can we be sure that important information has not been left out? Who will decide what is important for the citizens in the various Member States? The administrative effort of creating the summaries may not be any less than the administrative effort/cost of producing translations

If the writing is clear and concise then translation should not be a burden. Long waffling documents are an issue here.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

It is absolutely not acceptable to refuse to provide material in a language simply because there are very few speakers of that language. Either the languages are official languages of the EU or they are not. One could argue that Irish would be affected, given the numbers of speakers. At the end of the day, Irish is an official language and should be treated as such.

Europe covers a wide number of language families. Expecting the public to get by in a second language and to rely on inter-comprehension is not acceptable. It is a different matter in internal settings where the officials all have skills in various languages, and a totally different manner for public-facing situations.

The use of small number of "core" languages discriminates against smaller languages / languages of lesser diffusion.

- 7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”.**

Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

As mentioned above, with “linguistic diversity” we are not speaking about some lofty ideal, but about humans whose lives are impacted, day for day by the EU, positively and negatively, and who need to have the necessary information available in their own language to be able to make informed decisions. It all comes back to who will decide what is of “broad public interest” and what not.

- 8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?**

The “language issue” is fundamental to the success of the European project and should be dealt with within a legal framework to reflect the current reality.

Having a language policy in legislation would also send a strong signal about the importance attached to language within the EU.

If the language issue is not regulated in law, it will be easier to change based, for example, on administrative or financial criteria, which may not be beneficial for the language regime.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

a. How could the costs be met?

By reducing costs in other areas:

- Get rid of the nonsense that is the monthly move to Strasbourg;
- Why not introduce remote parliamentary meetings?
- Get rid of business-class flights for MEPs and all other EU staff within Europe. The furthest flight from Brussels is probably Bucharest – under three hours. Quite doable in economy class and it would save millions every year.
- Cut out the middleman (translation agencies) when sourcing external translators.
- Combine services and information in the various institutions, where possible
- Relocate the internal translation units from Brussels to the individual Member States. Apart from the cost reduction (less need for office space etc.), in-country translators are far more up to date with current language conventions. The danger of “Euro-speak” would be lessened.

b. Should they be met from the EU budget?

Yes, by rationalising the budget along the lines suggested above, thereby making more money available for translation, which is an essential part of the European project.

c. Should it be done by getting Member States to contribute for their own language?

If Member States are not asked to increase their budgetary contributions for other vital areas (like environmental policy) then why would they be asked to pay more to have information translated into their own language. Reducing wastage in other areas, and improving efficiencies within the EU would free up substantial amounts which could be re-focused on more useful things like translation.

d. other model

no comment

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation (MT) is a tool that is very useful in some situations, however, it is a tool to be used by and generally not to replace translators – if the purpose of a translation exercise is actually to produce a coherent document. We are far from a situation where MT can do all translation work.

The basic question here is: "is lack of accuracy acceptable price to pay for more translation simply because it is cheaper?"

The answer has to be no. Public-facing information is often intended to describe rights and obligations. You cannot get it wrong. You cannot get it "sort of" right.

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On behalf of the board of FIT Europe

Public consultation - The use of languages in the EU institutions, bodies, offices and agencies

Survey response 1

Response ID
47
Date submitted
2018-07-12 11:16:35

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>English should be the sole official administrative language. In time, two trends will converge: on one hand, more and more people will speak english, on the other, technology might renovate the need to ever learn foreign languages with accurate real time translation. English is the de facto Lingua Franca and there's no good enough reason to reverse this ongoing trend.</p> <p>What the EU should concentrate on is not translating documents issued in Brussels, but opening up "embassies" or representations or whatever you want to call them in all majour cities and make them as open and active in local politics and communities, with local employees speaking the local language that will intermediate between people and the EU.</p> <p>Otherwise, we need less of the language translation circus and confusion going on, not more. Less useless translated sterile documents, more direct intervention in local politics, cultures and communities.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>English should be the sole official administrative language. In time, two trends will converge: on one hand, more and more people will speak english, on the other, technology might renovate the need to ever learn foreign languages with accurate real time translation. English is the de facto Lingua Franca and there's no good enough reason to reverse this ongoing trend.</p> <p>What the EU should concentrate on is not translating documents issued in Brussels, but opening up "embassies" or representations or whatever you want to call them in all majour cities and make them as open and active in local politics and communities, with local employees speaking the local language that will intermediate between people and the EU.</p> <p>Otherwise, we need less of the language translation circus and confusion going on, not more. Less useless translated sterile documents, more direct intervention in local politics, cultures and communities.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>English should be the sole official administrative language. In time, two trends will converge: on one hand, more and more people will speak english, on the other, technology might renovate the need to ever learn foreign languages with accurate real time translation. English is the de facto Lingua Franca and there's no good enough reason to reverse this ongoing trend.</p> <p>What the EU should concentrate on is not translating documents issued in Brussels, but opening up "embassies" or representations or whatever you want to call them in all majour cities and make them as open and active in local politics and communities, with local employees speaking the local language that will intermediate between people and the EU.</p> <p>Otherwise, we need less of the language translation circus and confusion going on, not more. Less useless translated sterile documents, more direct intervention in local politics, cultures and communities.</p>

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The main EU wide website should only be available in English. Local websites for different cities - not countries, should exist, with more targeted relevant information for those communities, and those should be available in both English, for EU citizens living there, and the local language for non-English speakers.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Yes and no. Very few people actually care to look for them. So summaries on themselves are a waste of money. Summaries coupled with an active human EU presence in all major cities throughout the EU, involved in local culture, politics and community life will help popularize the union among its citizens.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

Let's not pretend English is not the de facto Lingua Franca of the EU and the world. Let's improve English proficiency that will have many economic benefits for speakers themselves and for our economies. The alternative would be reviving dead languages, made up ones or continuing the linguistic mess we are in now.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

As I already noted, English is enough

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

English should be the official Lingua Franca of Europe, with local languages protected and encouraged - like in Ireland in a way. Irish is taught and promoted but everyone is able to speak English

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

No increase in unnecessary costs is acceptable. EU member States can translate and cover the costs themselves. Let's stop pretending English doesn't exist or that we don't already all have at least some level of English proficiency. Some EU countries need to come to terms with the past 300 years and recognize why English enjoys the status it does and how trying to reverse this is counterproductive and expensive and useless

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Investing in European technology for better translations is always a good idea. Whether member States chose to use it or cover the costs themselves it's their choice. EU documents should only be made available in English

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Contact Information

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Organisation:
Country of residence:
Language of the contribution:
en - English
Other language in which you would agree to receive communications:
en - English
Category:
Individual citizen
Category: [Other]
Your reply:
can be published with your personal information (personal email addresses are not published)
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Survey response 2

Response ID
101
Date submitted
2018-07-13 22:30:34

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
By having a clear rule which states that all european languages can be used and should be used for all translation, this would remove all confusion and potential for bias.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Yes each eu institution should have a language policy and it should commit to have materials it publishes and translation available in all of the EUs recognised national languages (whether they're major or minor). Yes eu institutions should publish their language policy on their respective websites and this should be provided in substantial detail.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
Only that they will provided upon request. Perhaps only in a digital form. Translation should be available at no extra cost. To seek payment would show bias towards certain languages.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
All content on all websites of EU institutions should be available in all of the EU's major and minor national languages.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
If only summaries can be available then they should be available in all EU major and minor national languages.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
No. All matwri should be available in major and minor languages.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
No. Cost shouldn't be as important as making material available in all eu national languages. The EU is responsible to all its citizens, not only those who speak English French or German.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

A new legal framework would be ideal.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Raising additional monies from member states and reaching with member states a collective minimum rate of corporation tax for high earning businesses.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

If they have to be machine translation can be used to accelerate translating. Machine translation will only get better. New EU investment in a European wide project for translating technology will boost employment and increase efficiency.

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Contact Information

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Language of the contribution:

en - English

Other language in which you would agree to receive communications:

ga - Gaeilge

Category:

Individual citizen

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 11

Response ID
1021
Date submitted
2018-08-13 10:09:20

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? Information output should be reduced to English French and German, unless specifically addressed to a particular country, in which case, it could also be translated into the official languages of that country.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? No. A pragmatic approach should prevail.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? translations should be limited to EN, FR and DE.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? Main website should be in EN, FR and DE. Additional translations could be included if paid for by the Member State requesting it.
5. Would it be helpful to have summaries of key issues published in all or many official languages? Yes
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? Yes. Basic cost efficiency is the criteria to be used.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? No. This is too costly.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

No

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

By separate and specific MS funding.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation is not yet of sufficient quality for this.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

United Kingdom

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

fr - français

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 12

Response ID
1059
Date submitted
2018-08-13 11:55:57

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>All official law needs to be translated. For everything else, give flexibility to each institution, while providing some good practices (without obligation).</p> <p>General comment on this consultation: It's really not practical not very good as a method to gather a large number of opinions by giving open answers everywhere. You would have got many more replies by having multiple choice. I wanted to reply but almost gave up when I saw the way this Public consultation was designed. I'm sure there are many others who will do the same; thus not many representative replies I'm afraid. After all the open replies, not even one open comment space where I could have left this feedback. In general, my view is that we should promote language learning among the EU population and for that less translations will be needed.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>Only very general rules, flexibility is needed for each situation and each institution.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>No service of translation, that is in itself disproportionate, and use the little EU budget to other common priorities.</p>

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p> <p>Only general entry points, that can then lead to other sites with less availability of languages.</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p> <p>Yes that would good, but only if there is no criteria for having many other sites in all languages.</p>
<p>6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?</p> <p>Yes of course! Otherwise it's impossible to have efficient and fast reacting institutions. Certainly no criteria of population size etc, it only creates tension and endless discussions on who speaks the biggest language. Better to have a criteria of the biggest number of the second language of learning in Europe for example (which is probably English). This is in line with the European spirit of learning beyond your own neighbourhood and country. The institutions could encourage and embody this ambition!</p>

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

Yes - it's all about being proportional, using common sense and being aware of budget constraints.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Why not a legislation which sets down the main principle that all EU law needs to be available in all official EU languages.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

There should not be an increase of translations resulting from this consultation. If it does, it cannot be a good policy and it will not result in EU policy reaching further than now - the issue is not about translations.

It should be the opposite, less translations so that budget can be used to other more effective means.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation is not perfect but really fine to get an understanding of the main message. It should be used much more for all documents and sites (except EU law).

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0

Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Language of the contribution:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 17

Response ID
1162
Date submitted
2018-08-14 17:17:06

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Creating and properly managing information online in multiple languages is expensive and daunting. I believe the EU should first prioritise ensuring accessibility of information in a user friendly way. Too often websites are old and unusable (eurostat being a prime example). If search functionalities and poor and navigation and design is from 1998, it doesn't matter what language the content is in- because the end result is that it unusable.

Most web browsers now offer a translation function. Although I think it is key that the EU honour its obligation to communicate in its citizens' native languages, too often the uncoordinated approach to managing these websites across DGs just makes this an impossible feat. There are a lot of structural issues (such as a lack of in-house digital skills due to outmoded EPSO recruitment, outsourcing to cheap and low-quality agencies due to procurement binds) that the institutions need to address before they expressly extend their obligations.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

The EU institutions should have a language policy, and they shouldn't allow different bodies within each institution to deviate. It should be simple and effective- meaning the burden of translation costs should not be disproportionate to the public interest.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

Other than EU law, I do not personally see an obligation for the institutions to provide a translation service to private individuals or companies. I think the need is too small, and if content is available in French, German and English then that is sufficient. They should avoid, however, overuse of PDFs. Not only is this just lazy website building and maintenance, it makes it impossible to use in-browser translations or copy/paste into your own translation software. This money is better spent on improving the usability of websites.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The institutions currently have very few 'citizen-facing' websites- i.e. the websites are designed for companies, lobbyists and public interest groups. Very few European citizens use the EU websites as their go-to source of information. This is predominantly because the websites aren't search engine optimised, but also because they tend to be written in a technical way. Copywriting is an art, and having policy officers write and design web pages that is then robotically translated is not going to help with the EU's communications deficit.

The institutions should conduct a study to ascertain which areas are faring well in terms of traffic from the general public and where there is an unmet need (on a country by country basis). They can do this with a mix of surveys and search analyses (to see what people are searching for, e.g. "can I take my pet abroad?" or "what is the EU doing for refugees?" and should focus their attention on making those even more accessible in multiple languages.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Yes. But if these websites are not search engine optimised, then no one will be able to find them. Whenever I need to search for a specific topic, I need to type "europa" etc into my search terms to even have a chance of finding it. SEO optimisation is an oversold and much misunderstood concept, so the Commission should rely of reputable experts in this regard.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

It is acceptable. It is quite accepted in 2018 that the majority of the content online is in English, and in-browser translations are advanced enough that this doesn't pose a huge problem.

I somewhat disagree with the unofficial policy that the priority second and third languages are French and German. I feel this is a political relic from the past that is unfair. English is a global lingua franca. If you are trying to push for accessibility for monolingual people, this should include the Italians and the Polish as much as it should include the French.

In this case I think the most fair criteria for selection of these 'limited' languages should be how many people speak it as a SECOND language. That way you can ensure maximum accessibility.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

Again, I somewhat disagree with the policy that the priority second and third languages are French and German. I feel this is a political relic from the past that is unfair. English is a global lingua franca. If you are trying to push for accessibility for monolingual people, this should include the Italians and the Polish as much as it should include the French.

I think resources would be better spent on (a) making these consultations more user friendly and (b) effectively promoting these consultations online.

For example this consultation- the questions are long and assume a certain level of knowledge and interest in the EU. I happen to have a passion for communications, but I simply can't imagine any layperson or a person of lower education managing to successfully fill out these forms. Unfortunately this means consultations tend to be a tool for lobbyists, not for citizens. There has to be a way to engage citizens on more issues, and I think language is an important part- but not the most important part.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Yes. As mentioned previously, with globalisation and the internet a lot has changed in terms of the way in which we treat languages. English has become the lingua franca, and languages such as French that used to have a greater importance in international relations are fading in importance. I don't think this is a bad thing- English has become the language we always wanted esperanto to be. It is rare to find someone without a passive, basic understanding. English is also a language that embraces change, evolving into different dialects across the world (arguably even in Brussels). With Brexit looming, we need to modernise the way we think about languages. And maybe that means I should have spelt modernise with a 'z'...

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

I do not suggest we engage in any additional translations unless there is a clear and pressing unmet citizen need. In that case, the budget should be re-apportioned from other areas where the need is less pressing.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Yes. I have a great deal of respect for translators and the work they do- but their work isn't perfect either. The modern business world is turning away from translation and to transcreation- i.e. you have the pertinent information that is the same for everyone in English, but then you localise and personalise. This doesn't mean mandating certain things to be translated, but rather employing someone to adapt this for local markets. Of course this can't be done for legal instruments, but if the institutions were to adopt a more user-focused approach, decentralised control and streamlined, engaging centralised content would be the way forward.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Belgium

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 18

Response ID
1189
Date submitted
2018-08-14 22:23:28

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
No idea.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Yes, no idea, yes, no idea.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
No.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
English and Russian enough. Those are the languages that defeated fascism and saved Europe. That's enough.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
Not really, who reads your stuff?
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
As I said, language of the good guys enough. English and Russian only.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
What?

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Yes detailed legal framework please. But only in English and Russian, no evil or cowardly languages. Maybe Esperanto, that's good.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Cut out the bad languages. Easy. Eng & Rus!

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

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Contact Information

Title, Name, Surname:

Mr M.G. Bullen

Organisation:

Intergalactic Languages Unlimited (inc. Klingon)

Country of residence:

Germany

Language of the contribution:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 20

Response ID
1244
Date submitted
2018-08-17 14:40:26

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
The criteria should be published.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Yes, each one should have their own (institutions vary in size and information relevance to public) The policy should be published in general terms. When other restriction in specific cases are applied, this choice should be justified.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
No. If restrictions are duly justified there is no need to provide translation. Obviously the right to appeal for an unjustified restriction should be granted.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
The parts of general interest that influence the public should be available in all languages . This includes implementing rules and guides for EU programs.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
In all.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
It is either the institution's working language or all. Any other situation would be discriminating and highly questionable as even a significant part of the population speaks the language, may be fir a small part speaking another language this topic in more important.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
No it does not. It definitely restricts the participation and creates two categories citizens.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Better outside a detailed legal framework.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

By reducing the volume of documents produced that quite often repeat information or bring no value.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

If still readable and the choice of an original is given, why not?

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

ga - Gaeilge

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 36

Response ID
1897
Date submitted
2018-08-20 21:36:11

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? Number of speakers would be a good criteria (for instance, always translating into all languages with more than 5 million speakers), although ideally all languages should always be used.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? All languages should be used across all institutions
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? There more expensive things than translation but as said before, but as mentioned before, the number of speakers should be a good criteria.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? All EU websites should have all their content available in all EU languages
5. Would it be helpful to have summaries of key issues published in all or many official languages? In all
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? Population size

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? Spanish and Italian should be added the 3 current main languages
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

it would be wised to have a law about it

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Lower salaries of EU representatives, as simple as that.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

No, not acceptable. It could be very confusing and misleading.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Spain

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

es - Castellano

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 40

Response ID
1968
Date submitted
2018-08-21 10:39:14

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
Overall users of such language. For example, Spanish is the 2nd most spoken language in the world and is irrelevant regarding EU institutions. I think using a worldwide known language would be beneficial not only for Spaniards but also for Latin American immigrants that apply for citizenship and thus become EU citizens as well.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Not all institutions are the same, therefore, an individualised policy would best guarantee EU citizens' rights. The introduction of more Roman languages (Spanish, Portuguese, Italian) would be beneficial to achieve that goal.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
When it comes to safeguard the rights given to EU citizens in the diverse treaties, I think the limit should be precisely that: no citizens should be discriminated against /be helpless when having to deal with EU institutions, especially anything related to laws, EU court, etc.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
Whereas English is well established as a second language in many countries (though not officially), I think the introduction of Spanish is necessary due to the fact that it is spoken all over the world and the number of people who speak it is increasing largely.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
Indeed, if possible, it would help people that are not bilingual to at least have a minimum understanding of the matter at hand.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
If the goal is to reach as many people as possible, it is obvious the answer should be the most spoken language. English, French, Spanish and maybe German should be sufficient.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

Many German, portuguese, Dutch, Belgian speakers have a good level of English, thus making it an unnecessary cost to translate EU content to that language. On the other hand, Spaniards and Italians have a poor knowledge of English, thus making it necessary to make it available for them to have EU content in their language. Spain's isolation from EU institutions is evident, and it is one of the largest countries in the EU. It is a problem that should be tackled immediately if we want to strengthen the bond of the EU as a whole, especially in this euro - skepticism climate. Such a gesture would be well received and contribute to a better alliance.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Times change. People change. Laws need to accompany that change so that they keep up with the times. Being a founding member should not mean to have privileges over other countries, since we are a union and we want to stay as such, even strengthen the bonds and unify some parts of our legislation. Yes, language policy should be reviewed and updated.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Members of EU government and parliament have too many privileges (not only salary, but many other accommodations). Perhaps reducing the costs of maintaining them (penalising absentry, sharing official cars, eliminating diets and other supplements) would make enough "room" to implement a new language policy.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

There will always be a need for a human translator, but using such advanced programs (not Google translate but professional ones) would save time and money, since the translation would be halfway done and just need adjustments, instead of having a human translator do it from scratch.

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Contact Information

Title, Name, Surname:

Lucía Amo Vázquez

Organisation:

Country of residence:

Spain

Language of the contribution:

es - Castellano

Other language in which you would agree to receive communications:

it - italiano

Category:

Individual citizen

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 41

Response ID
1969
Date submitted
2018-08-21 11:02:22

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Over the years, the number of pages produced by the Commission translation service for instance has remained quite stable at around 2.2 million pages annually. I am not aware of the figures related to the other Institutions. This figure includes a lot of other documents besides the legislative proposals of the Commission. The Commission has increasingly adopted the policy of translation a lot of material in the internet into all official languages, e.g. communication campaigns, Brexit related material etc. What is frustrating sometimes is that the translations appear with a delay, even if they are produced on time. This gives the impression that translating to all the official languages is something that is not clearly thought of, or does not have the urgency often attached to these assignments.

The Commissioners themselves communicate more and more with the citizens, often with multilingual tweets etc. These all have to be translated even in the middle of the night.

If an immediate response time and a large amount of production is expected, it is bound to be a costly operation. Often the requirement to translate to 24 official languages does not seem to have a clear political justification, because in the Commission the operations are run by fairly independent DGs. In case of legislative proposals, the requirement is clear. However, for instance in case of Communication campaigns aimed at a certain country or group of people for instance, it is less clear whether this is cost-effective.

The previous Commission communication on translation issues dates, I believe, to 2016. Perhaps it is time to revise these principles.

Some criteria to be used for deciding whether the texts should be available in all official languages, could be :

- legislative nature of the text
- urgency
- political importance - decision by the College ?

In order to come up with a more complete set of criteria, an interinstitutional working group could be set up.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

It would be much more transparent to the citizens, if the language policy would be published on each institution's web site. Given the different roles of the institutions in the decision making roles, such a language policy should take that into account. The citizens are not normally aware of the rules in the Treaty or the Council Regulation No 1. These documents are not very clear in any case to an ordinary citizen.

The policy should outline clearly cases where the choice of languages is restricted e.g. to the three working languages of the Institutions (EN, FR, DE). However, this should be set out at the level of a principle or document types, to make the policy simple and understandable. If the policy gets too long and complex, it might be counter-productive.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

The problem here is how you define what is disproportionate, and from whose point of view. The cost of translation has been discussed in the Commission for quite some time, since 2016. However efforts to curb the demand have consistently failed. This has led into a situation, where the Commission translation staff is required to work more and more, while they are being told they are too expensive. This is hardly good administration, or reasonable HR policy.

The launch of eTranslation tool has made it possible for public services in each Member State to get a fast translation of a document quickly. Member states and ultimately the citizens, when the tool will be integrated to different trans-European public services, Machine translation will give the gist of a document but it is not equivalent with a professional human translator.

In case institutions are required to provide translations on request, a defined policy would help how to limit these cases. Alternatively, or in addition, institutions could provide lightly edited machine translations with a disclaimer, but even this requires workforce. Document types where translation will not be provided should be clearly defined in such a policy. However, the risk is that "grey translations" will increase, when requests are declined. Any kind of official document going outside the Commission should be prepared by professionals.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

Since there is no clear policy, a lot of content is provided in 24 languages. It will be very difficult to go back to a more restrictive policy now. It would be perceived negatively by the citizens.

Most definitely information on the Commission's major policy initiatives, legal issues and issues that concern everybody, such as Brexit, should be available in all official languages.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Yes, definitely, this would also lower the translation costs, if not every piece of content has to be provided in 24 languages.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

If a policy initiative or communication campaign only concerns certain part of Europe, it might be advisable to restrict the number of languages. It is very flammable politically to start restricting the number of languages based on population size speaking the language in question. For example only a very small proportion of the people in Ireland speak Irish, while in their Constitution it is their first language.

I don't really have a good answer to this question, but if linguistic diversity is a gift and a special issue for Europe, then smaller languages should not suffer. If it is regarded only as an extra cost, yes, small languages should go for cost reasons.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

It is a problematic issue, as "broad public interest" is difficult to define. I totally agree translating summaries in all the official languages in all the cases.

Perhaps it would be helpful to cast on eye on all public consultations published so far, and try to extract data, based on which we could define what has been regarded as a "broad public interest". ON the other hand, broad public interest is attached by definition to almost all the public consultations, because why would one consult the public at all, if there is no broad public interest ?

I believe that the Commission's policy would benefit from more clarity in the light of existing data, before the other institutions adopt a similar policy, otherwise the situation might look a bit chaotic from the citizens' point of view.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

I believe that the situation now with 24 official languages is vastly different from four official languages. Already in 1958 someone remarked that even keeping four versions completely coherent will be a huge task. That person, whose name I don't now remember, should see the present situation. It is of course a vastly complex task to do this.

Nowadays translators have well developed IT tools to keep up the coherence with the language versions in particular in the legislative documents. This helps with the huge task they have.

I believe that there has to be a legal framework that defines in which languages EU legislation is available. It would be difficult to justify a situation, where EU acquis and other legislation would not be available in the languages of all the member states. It would certainly be regarded as discriminatory to some of them. All the language versions of EU legislations are binding, and there is no one authoritative version.

Another matter completely is how widely and extensively the Institutions then communicate with the citizens in all their languages. This has kept increasing with each Commission, for instance. So there are two layers in the issue, "must have" and "nice to have". Must have is always there. With nice to have, the cost may spiral out of control, unless action is taken. There should be a clear framework for that for each institution. Additionally, the institutions should collect data on how much the multilingual content is read.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

At the moment, machine translation is no really a solution for cost cutting. It works for some languages, but not for others (e.g. Finno-Ugric languages). However the technology is developing fast. In around five years, situation might be quite different.

I very much doubt that Member States are willing to fund "nice to have" translations. What would be their motive? Do they really want all these translations? Regarding the "must have" part, it is the EU who imposes rules and regulations on them, and the EU should pay for "must have" translations.

Outsourcing is a possibility to cut costs, as it is cheaper than doing the work in-house, but the present system of outsourcing is not working well during work peaks, and is administratively cumbersome, which adds to administrative burden.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation is developing, but the quality varies a lot from one language to another. It should not be used currently for legislative documents, where accuracy is the key, Regarding for example web content, an edited machine translation might save time and cost, but it is unclear as yet, how machine translation impacts the productivity of the translators.

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Contact Information

Title, Name, Surname:

██████████

Organisation:

██████████

Country of residence:
belgium

Language of the contribution:
en - English

Other language in which you would agree to receive communications:
en - English

Category:
EU institution

Category: [Other]

Your reply:
can be published in an anonymous way

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Survey response 44

Response ID
2009
Date submitted
2018-08-21 15:38:21

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
There should be a basic rule that everything applicable to all EU member states is available in all official languages (we can use machine translation for less important issues where no quality "fit for publication" is necessary). All topics applicable to only one or several member states should be available in a restricted number of languages with link to the Commission machine translation for those who do not master them and wish to be informed.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
There should be only ONE language policy applicable to all EU bodies and institutions - for communication with general public. Each institution should be allowed to have its own internal language policy for the sake of efficiency - e.g. only EN, DE and FR are used in the Commission.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
Only one general policy for all EU bodies and institutions - if somebody asks for documents for the sake of transparency he or she should get EN, DE or FR version and a corresponding machine translation.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
Level 1 pages should be available in all EU official languages - level 2 and further pages should be available in any official language through machine translation.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
No, this is waste of time and money - machine translation is enough.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
Only one criterion - general information available in all official languages specific in a restricted number - the rest via machine translation.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
Again, only one policy should exist for all the bodies and institutions. Current Commission rules are reasonable.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Regulation no. 1/1958 as amended is sufficient. No new legislation is needed.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

If member states require more than currently provided they should pay for it.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation is not accurate it is for information purposes only - decent results come only between EN and other languages. Any other combination provides ridiculous results and should not be used at the current state of technology (neural machine translation is another hype and it haven't brought tangible improvement - it is better readable and often less accurate than its predecessor).

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0

Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Germany

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

de - Deutsch

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 45

Response ID
2134
Date submitted
2018-08-22 10:58:27

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
I agree that a clear policy /set of rules from the highest governing bodies of EU institutions/administration is clearly missing. However, looking at the introduction to this survey and the first question (oh, two questions in one, actually), it is also clear that not only the language matters, but also the way you communicate. A guestimate from my side would be that 3 quarters of EU citizens would have already stopped reading if they happened to land on this page.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
I think that openness about the language policy of EU institutions is essential and there is no reason to not publish the reasoning behind a decision. Wanting multilingualism is not coherent with cutting budgets in the language services. Translations are not for free!
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
I think that there is no reason not to have such a policy. Possibly, several propositions with price tags could be given to the requester of such translations in order to increase the awareness of the cost of multilingualism.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
I think that content relating to the functioning and purpose of an institution should be available in all EU languages. Other information should be available in e.g. 5-6 EU languages that are considered the most commonly known in the EU. A study based on mother tongue and language learning at school could be the basis of deciding which languages this would be. If a member state fails to provide proper language training in schools, this is a major issue and in my opinion, the country is missing a fundamental prerequisite for being a member of an international organization. No country in the EU is an island!
5. Would it be helpful to have summaries of key issues published in all or many official languages?
Summaries are very useful and should be used a lot more - in clear, non-bureaucratic style, please!
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
Yes! I think that the member states are responsible for providing their population with language training so that they can navigate in an international context.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

We want more for less is a pathetic approach. Yes, multilingualism does cost! If you prioritize making translations available, be ready to pay for it. It could make sense to let the citizens know how much a translation actually costs and to make it clear which language version is the original and which are the translations.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

I think that time has come to be very specific about the language issue. First of all, being transparent about a policy is useful (rather than having a policy, but not wanting to discuss it). Secondly, nobody wants "Brussels" to "waste" "their" money on "nothing" - use this opportunity to let citizens know how a part of their money is spent.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

I am in favour of earmarked funding from the member states - of course, split equally on all member states who want specific information published in their national language (we are operating in a context where solidarity should be an important factor). Perhaps some member states would choose to prioritize their spending differently? Language learning is a key element in operation in an international context - like it or not.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

As long as it is clear that a text is machine translated and possible not accurate, I do not see a problem with this.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Luxembourg

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

da - dansk

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 57

Response ID
2804
Date submitted
2018-08-28 16:36:06

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? maybe put out a regulation about this
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? I think that all the EU institutions should have the same language policy. They should be published on the policy. I think the core languages must be used at all times (French, English, German) and the other languages in most all other cases unless it has to do with something that doesn't concern that particular member state. maybe if it is translated in just some languages, if a certain number of people request it in a particular language, then it must be translated.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? maybe put that the requestor has to prove that without having it translated, he or she will suffer in a particular manner?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? general parts
5. Would it be helpful to have summaries of key issues published in all or many official languages? yes-that could be a solution to avoid translating
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? yes? not population size or linguistic diversity. Subject matter for example something about indigenous people in Finland would not have to be translated into Portuguese in my opinion.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? maybe but I wonder what 'broad public interest' is? Additionally maybe it's not particularly interesting for the broad public but could have severe effects on people - the impact on the citizens should also be considered
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

no I think there should a new regulation

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

individual states should pay additional funding but the other countries using French English and German should also have to pay since they are already getting theirs translated without having to pay. Maybe everyone pays a set fee.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

this is an easy short-term solution but I think it will turn out to bite back in terms of litigation due to mistranslated sections. Maybe for a short-term solution, for example to get something out to the public but say that it can't be relied upon and that a correct version will be uploaded shortly. and then DO IT. Too many times the machines translate something the exact opposite of what it means.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Italy

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

it - italiano

Category:

EU institution

Category: [Other]

Your reply:

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Survey response 60

Response ID

2869

Date submitted

2018-08-28 22:01:57

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

End the languages turmoil. Only solution: ESPERANTO

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

End the languages turmoil. Only solution: ESPERANTO

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

End the languages turmoil. Only solution: ESPERANTO

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

End the languages turmoil. Only solution: ESPERANTO

5. Would it be helpful to have summaries of key issues published in all or many official languages?

End the languages turmoil. Only solution: ESPERANTO

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

End the languages turmoil. Only solution: ESPERANTO

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
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End the languages turmoil. Only solution: ESPERANTO

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

End the languages turmoil. Only solution: ESPERANTO

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

End the languages turmoil. Only solution: ESPERANTO

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

End the languages turmoil. Only solution: ESPERANTO

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Contact Information

Title, Name, Surname:

Doctor Ferruccio MASNATA

Organisation:

professional, private practice

Country of residence:

Italy

Language of the contribution:

it - italiano

Other language in which you would agree to receive communications:

it - italiano

Category:

Individual citizen

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 62

Response ID
2946
Date submitted
2018-08-29 11:42:30

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? I think that criteria should be established in the form of best practice guidelines and not as legislation. The criteria should be established for each type of information concerned eg. public consultation, press releases, citizens' requests for information, case law, etc.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? In general all EU institutions should adopt a common policy, with the exception of areas which are specific to a particular institution eg. replies to parliamentary questions, opinions from the Committees, etc.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? All institutions should have a common policy. To avoid disproportionate costs, all institutions should be able to generate translation from a common pool of resources allocated specifically for such purpose. For example, it should be possible that such translation requests are assigned / processed by any of the institutions.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? All EU websites should be available in all EU languages, without exception.
5. Would it be helpful to have summaries of key issues published in all or many official languages? Publication on websites should be done in all official languages. Publication on printed media could follow specific criteria.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? Yes, it could be possible that information that is more relevant to some Member States is provided in a restricted number of languages.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? Yes, I agree fully.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

I think the adoption of guidelines is more appropriate, rather than a legal framework.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

A combination of increased funding from Member States, and increased efficient pooling of resources (financial and human) among different EU institutions.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translations are already being used extensively, however, the technology is not yet developed /advanced enough to permit EU institutions to rely solely on machine translation work.

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0

Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Belgium

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

pl - polski

Category:

EU institution

Category: [Other]

Your reply:

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Survey response 68

Response ID
3089
Date submitted
2018-08-29 20:19:22

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
<p>Thank you for the opportunity to express my opinion on linguistic diversity and related issues. I just now read about this public consultation in a press release of the Universal Esperanto Association, of which I am a member and in the Rotterdam headquarters of which I worked for twenty-six years until my retirement four years ago. You will be receiving, or have already received, a certain volume of stock Esperanto answers to your questions, but I will present my own as these differ from those recommended by the association. You may note that they seem more radical, but in fact I believe they are more in line with the view of the creator of Esperanto than with the current predominant Esperantic perspective.</p> <p>On this first question, I do not believe that the gaps alluded to should exist at all. I am as in favor of linguistic diversity as anyone else, but I do not feel that this should come at the expense of the economy obviously to be attained by the use of a single language understood by all and in which all are more or less equally competent. Many enthusiastic Esperantists would posit their language for this role, and Esperanto is doubtless worthy of serious consideration. It has a regrettably inconvenient writing system, however, and is widely regarded as unattractive, and so I think it is unlikely that it will ever be generally accepted despite its considerable attainments. But neither its faults nor those of English (which are significantly more considerable, however many bigwigs and other speak it) discredit the ideal of a single international language for common use.</p>
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
<p>Having stated the above, I can hardly be in favor of a multiplicity of language policies, at least in the long run. In the short run I don't know, but I feel there should always be a general sense of a long-term movement toward the establishment of a single (planned) international language to satisfy the desires and requirements of every EU institution. Interim language policies might justify temporary injustice on the basis of this movement toward justice, and while perhaps a bit dubious I would still find this preferable to hypocritical proclamations that don't correspond to reality, or to wildly inefficient multilingual procedures.</p>
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
<p>I think an obvious answer here would be to lay the cost on those requesting the extraordinary translations, though this would of course be out of line with the pretensions concerned.</p>

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
<p>As a confirmed and outspoken proponent of the establishment of a single planned international language for common use, I happily don't feel that this is my problem. Pressed for an answer, I would propose that a basic homepage be provided in each EU language without exception, but beyond that more or less nothing, with apology for the provisional dominance of English but with promise of a more equitable situation to come in the hopefully near future.</p>
5. Would it be helpful to have summaries of key issues published in all or many official languages?
<p>In either all or only one or two, I would say. I don't find inconsistent fiddle-faddling to be an attractive proposition at all.</p>

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

I think it's acceptable in *all* circumstances to provide material in *one* language. To me in fact that's the only acceptable policy. The EU and its institutions can continue to muddle around on this if they want to, but I believe the obvious solution will eventually win out, regardless of how long it takes.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

It may be the best that can be done at the present moment, but I wouldn't recommend it for the long term. There should at least be a serious exploratory commission looking into the prospects for a democratic pan-European language.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

New legislation would definitely be helpful, and I think anything else is rather dubious.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

I suggest they be avoided by moving not toward wider multilingualism and its significant attendant costs, but toward the efficiency of a single-language system that should nonetheless be just, entailing the use not of English (or French or German) but of a linguistic compromise accepted on all sides.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Such technology can certainly be used and I find it acceptable despite its quirks, but I'm not satisfied with mere acceptability. The EU should become actively involved with the development and implementation of a planned language such as Esperanto. The appreciable successes of the latter, even with its acknowledged faults (which are actually relatively few and may even be regarded as minor), is proof of the feasibility of this approach. I again call for a serious exploratory EU commission on this matter.

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Contact Information

Title, Name, Surname:

Mr. Roy McCoy

Organisation:

retired (worked at Universal Esperanto Association, Rotterdam)

Country of residence:
United States

Language of the contribution:
en - English

Other language in which you would agree to receive communications:
es - Castellano

Category:
Individual citizen

Category: [Other]

Your reply:
can be published with your personal information (personal email addresses are not published)

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Survey response 69

Response ID
3101
Date submitted
2018-08-29 19:49:24

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? If all learned an easy language then all could communicate in this language. All keep their own language.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? Yes all EU institutions should have a language policy. Protect every native language. As every person must be allowed their own language.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? All institutions should publish in the before mentioned easily learned language. This saves money. And even makes sure all understand.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? Not in every language. Just that 'bridge-language'.
5. Would it be helpful to have summaries of key issues published in all or many official languages? A summary yes. But only in that 'bridge-language'.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? Difficult to decide which languages as right now 24. Pick one easy learnable language for all.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? No respect here for the languages not chosen! Respect every language og protect the right to speak fx Spanish in Spain. But in the EU speak that common 'bridge-language'.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Laws about language? Well, laws to protect native languages, yes. To protect these. And then just a simple declaration that the EU used this or that bridge-language for 'work'.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

No. Just use one language. Translate all into that.
Would save a lot of money.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Carefull here. Legal documents must mean the same in all countries. If one bridge-language accuracy is obtained.

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Contact Information

Title, Name, Surname:

Mss Tara Gregers

Organisation:

Country of residence:

Denmark

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

da - dansk

Category:

Individual citizen

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 75

Response ID

3382

Date submitted

2018-08-30 11:42:13

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

The linguistic rights of each and every European citizen are inalienable from their core human rights. Not to produce any document or communication in any of the official languages of the European Union directly affects those core human rights. To restrict the number of languages used to communicate with the public, other institutions or any other entity to a few or, even worse, just one would mean to cut off a huge section of the public who does not speak or does not properly master that language (or those few languages). This would not be fair, just or neutral and would impose by force the use of one or a few languages with benefits only to the native speakers of that or those language.

The only fair and just solution is the use of a neutral language. This would not only hugely reduce the immense translation costs of the EU but it would also speed up decision-making and avoid discrepancies between language versions and other difficulties that arise in the EU institutions on a daily basis.

But of course the most important benefit would be the maintenance of fairness, justice and neutrality among the 28 members of the EU, their peoples and their many languages and cultures.

This language already exists. It is called Esperanto and it is really baffling to see that, to date, it has not been seriously taken into consideration, considering the huge benefits that this would bring.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

Yes, the policy would be simply this: All official languages of the EU are totally equal, and equal in real practical terms, not just in theory. No language of the EU is in any way superior to another. Given that they are all natural native languages of one or more of the member states, the use of only one of more in any of the activities of the EU would go against basic human rights of millions of citizens. Therefore one neutral language must be found and used. This language already exist, it is Esperanto and could be practically implemented very easily, saving many billions of Euros every year in the process. This is the only way to respect the rights of all the languages of Europe and of the EU, including both the 24 official ones and the other languages used on the continent.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

See above. Each institution should adopt the same policy as the overall EU policy in 2. above. Whenever a document is produced, if it is needed by a specific country or linguistic group, it can then be translated into the neutral language Esperanto and then only translated into the language of that country by the country itself from the neutral language, as and when needed, thus avoiding huge practical and financial costs in translating into 23 other languages.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The same principle applies. Either we have all languages or a neutral language. None of the natural native languages of the EU have any right of appearing on a website exclusively, and at the expense of any other language. The costs of translation here are also substantially lower than the costs of translations of paper and other documents mentioned in points 1. to 3. above.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Yes.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

No, it is not acceptable for the points outlined above.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

No, this is paving the way to the dominance of one or a few languages at the expense of others. Linguistic and cultural dominance leads to economic dominance and then possibly political dominance.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

These ever increasing costs could be drastically reduced by the use of one neutral language and the translation into national languages could be done at the point of need rather than a translation 'a priori' into 24 languages.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

No.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

it - italiano

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 81

Response ID
3487
Date submitted
2018-08-30 16:55:00

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Please read 'English-Only Europe?: Challenging Language Policy' by Robert Phillipson in the original English, or in the Esperanto translation 'Ĉu nur-angla Eŭropo? Defio al lingva politiko' (<http://katalogo.uea.org/katalogo.php?inf=7183>)

This book was written specifically to address such questions, but the EU showed absolutely no interest in it, to the astonishment of the author. Public consultations have a reputation for being seen to be doing something, but ignoring the results. So I suggest that if there really is a rethink on language policy going on in the EU as a result of Brexit, then this is the place to start.

Bonvolu legi 'English-Only Europe?: Challenging Language Policy' by Robert Phillipson en la origina angla, aŭ en la esperanta traduko, 'Ĉu nur-angla Eŭropo? Defio al lingva politiko' (<http://katalogo.uea.org/katalogo.php?inf=7183>)

Tiu libro estis specife verkita por alparoli tiajn demandojn, sed EU montris absolute nenian intereson pri ĝi, je miro de la aŭtoro. Publikaj konsultadoj havas reputacion ŝajni fari ion, sed ignori la rezultojn. Do mi sugestas, ke se vere kazas reelpenso pri lingvopolitiko en EU rezulte de Briteliro, tiu estas la loko por komenci.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

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3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

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II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

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5. Would it be helpful to have summaries of key issues published in all or many official languages?

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6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

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III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

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IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Please read 'English-Only Europe?: Challenging Language Policy' by Robert Phillipson in the original English, or in the Esperanto translation 'Ĉu nur-angla Eŭropo? Defio al lingva politiko' (<http://katalogo.uea.org/katalogo.php?inf=7183>)

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Bonvolu legi 'English-Only Europe?: Challenging Language Policy' by Robert Phillipson en la origina angla, aŭ en la esperanta traduko, 'Ĉu nur-angla Eŭropo? Defio al lingva politiko' (<http://katalogo.uea.org/katalogo.php?inf=7183>)

Tiu libro estis specife verkita por alparoli tiajn demandojn, sed EU montris absolute nenian intereson pri ĝi, je miro de la aŭtoro. Publikaj konsultadoj havas reputacion ŝajni fari ion, sed ignori la rezultojn. Do mi sugestas, ke se vere kazas reelpenso pri lingvopolitiko en EU rezulte de Briteliro, tiu estas la loko por komenci.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Please read 'English-Only Europe?: Challenging Language Policy' by Robert Phillipson in the original English, or in the Esperanto translation 'Ĉu nur-angla Eŭropo? Defio al lingva politiko' (<http://katalogo.uea.org/katalogo.php?inf=7183>)

This book was written specifically to address such questions, but the EU showed absolutely no interest in it, to the astonishment of the author. Public consultations have a reputation for being seen to be doing something, but ignoring the results. So I suggest that if there really is a rethink on language policy going on in the EU as a result of Brexit, then this is the place to start.

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10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Please read 'English-Only Europe?: Challenging Language Policy' by Robert Phillipson in the original English, or in the Esperanto translation 'Ĉu nur-angla Eŭropo? Defio al lingva politiko' (<http://katalogo.uea.org/katalogo.php?inf=7183>)

This book was written specifically to address such questions, but the EU showed absolutely no interest in it, to the astonishment of the author. Public consultations have a reputation for being seen to be doing something, but ignoring the results. So I suggest that if there really is a rethink on language policy going on in the EU as a result of Brexit, then this is the place to start.

Bonvolu legi 'English-Only Europe?: Challenging Language Policy' by Robert Phillipson en la origina angla, aŭ en la esperanta traduko, 'Ĉu nur-angla Eŭropo? Defio al lingva politiko' (<http://katalogo.uea.org/katalogo.php?inf=7183>)

Tiu libro estis specife verkita por alparoli tiajn demandojn, sed EU montris absolute nenian intereson pri ĝi, je miro de la aŭtoro. Publikaj konsultadoj havas reputacion ŝajni fari ion, sed ignori la rezultojn. Do mi sugestas, ke se vere kazas reelpenso pri lingvopolitiko en EU rezulte de Briteliro, tiu estas la loko por komenci.

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Contact Information

Title, Name, Surname:

Ian Fantom, MSc

Organisation:

Country of residence:

UK

Language of the contribution:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 89

Response ID
3701
Date submitted
2018-08-31 12:48:01

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? English should be made the base working language in all cases. This reflects the realities of foreign language teaching in European schools at this moment, and would be a long-lasting solution.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? Languages policies should be published on institutional websites, but it is important to avoid over-regulation on language use, especially for lower-level and technical meetings, so as to avoid excessive costs.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? EU regulations and major strategy documents should automatically be available in all EU official languages. Smaller documents, technical documents, minor communications should be available in English, with French and German summaries.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? EU institutions should use English, French and German on their websites. Summaries should be provided in other official languages.
5. Would it be helpful to have summaries of key issues published in all or many official languages? Yes.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? Yes. Population size should be a top criteria, but also the degree to which a language is used in schools across Europe. Spanish, for example, is more prominent than German or Italian in this regard.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? Public consultations should be conducted in all official languages.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Yes. A working language is needed. It should be English.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Which is why there should be no increase in documents provided in all languages. Cost increases are likely to spark a backlash.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Only if technology advances further. At the moment, it is not sufficiently exact.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Romania

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 90

Response ID
3724
Date submitted
2018-08-31 14:23:22

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
All documents should be available in English; other languages optional
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
There should be a single 'minimum' language policy for all EU institutions comprising the mandatory use of English; other languages should be used only in proportion to needs
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
translations should be kept to a minimum

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
country-specific communication should be available in the language of that country; otherwise keep to a handful of core languages (mainly English)
5. Would it be helpful to have summaries of key issues published in all or many official languages?
potentially, but this is dependent on the communication strategy of the institution
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
embrace English as the European lingua franca, in particular after Brexit eliminates the native advantage of the UK (leaving Ireland which is of more manageable size)

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
yes

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

legal framework should only specify a minimum commitment to all languages; practice should reflect priorities and communication strategies

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

those costs should decrease rather than rise

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

machine translations should be used widely and the technology should be invested in by the institutions given the obvious issue of juggling so much linguistic diversity

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Language of the contribution:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 103

Response ID
4745
Date submitted
2018-09-04 09:08:14

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
For instance: A few general criteria should be decided, addressed and easily publicly available at European level. In this schema, each Member State should adopt some fundamental principles applicable in all cases. In this frame, each institution or web site reports symbol of languages and statement about Language policy adopted.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Yes. Yes. - Policy clearly explained or to be easily reachable by a simple FAQ- system.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
Translation could be made available only if relevant to reach the aim. The different institutions may have different budget to allocate for this service. It may be counterproductive to impose obligation.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
For instance: - Obligation by law; - The life's opportunity for people, funding opportunity for people, region, specific excellence sectors that work on the territory and which do not particularly need foreigner languages (i.e.: opportunity for farmer, SME, in other words, for small entity that cannot afford cost of double translations ...)
5. Would it be helpful to have summaries of key issues published in all or many official languages?
yes. Summary which include information about to get further specific info, possibly in your Language..
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

I understand the issue, but, so far, public consultation, carried on in such way, are restricted to a small sectors of population. Without a proper national advertisement of public consultation also the translation in any Language would be of scarce success, but it would improve over the time.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

probably it needs an update. Other languages spoken by several other big counties (Spain, Italy...) would help.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

probably it would help, but I am not an expert in the field.

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Contact Information

Title, Name, Surname:

██████████

Organisation:

Country of residence:

Italy

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

it - italiano

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 108

Response ID

4918

Date submitted

2018-09-05 13:34:33

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

Clearer rules.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

The language policy should be as transparent and uniform as possible.

I would revise the language policy of the Commission, in regards of delivering in 24 languages towards to Council and Parliament in the same time. By allowing some extra days for translation, it would mean less costly translations and higher quality.
--

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

Yes. Cost is rather tiny, no problem.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

Europe.eu is too big, many parts are outdated..

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Yes.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

It is one option, but I don't recommend. The Euroscepticism is high and growing, due to under/miscommunication of EU's achievements.
--

There are big potential cost saving possibilities in translation services, like fit for publication originals without later versions, avoiding urgency, more cooperation with national experts, etc.
--

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
--

There is no problem in delivering in 24 languages.
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

New approach would be definitely helpful.

The administrative rules (release in 24 language versions in the same times) and the organisational setup (DGs create papers submitted late and with errors, DGT pays and produces, National administrations use) create several malfunctions in cost and quality.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

The multilingual procedures should be reviewed with focus on value creation and efficiency.

Please avoid cost calculations, I haven't seen a sufficiently good cost-calculation although I am a manager for DGT (Commission).

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

No, machine translation is an aid, not a replacement for translation.

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Contact Information

Title, Name, Surname:

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Organisation:

[REDACTED]

Country of residence:

Luxembourg

Language of the contribution:

en - English

Category:

EU institution

Category: [Other]

[REDACTED]

Your reply:

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Survey response 115

Response ID
5001
Date submitted
2018-09-05 17:13:39

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
There must be clear guidelines, across all EU institutions, on how to proceed, instead of it being decided ad-hoc. Within those guidelines, it should be clear that documents, webpages, etc. that either directly affect citizen life (civics, health advisories, education, social security, etc.) should be made available in each official language, as they must be accessible by all citizens without a presumption of them knowing a second language (a bit stretch, in several socio-economic contexts). Less critical documents should, nonetheless, be made available in several languages, the X spoken by most people in the EU, with an emphasis on spoken, not necessarily based on the number of inhabitants of different countries. For instance, many across Europe speak English, French or even Portuguese while living in countries where those languages are not the official state language. The goal is to reach as many people as possible, not to please the ego of individual nation-states.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Yes. In fact, even more than that: the EU as a whole should have such a policy, valid across all institutions, eventually with specific addendum for each, as necessary (that can go *beyond* the basics in terms of language diversity).
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
Again, a uniform policy would be better. Documents of a graver nature or impact should always be made available upon request (because, let's face it, even if 1000 people request a Greek translation you'll only need to translate it once...). Legislation, documents whose validity or impact will last for at least one year, and fundamental documentation such as strategic guidelines, Framework-Programme texts, etc. would fall into this category.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
Most of my previous replies apply here. On this day and age, why are we making a distinction between a "website" and a "document"? Both are documents, only in different forms. Where are citizens going to find their "EU documents" if not on the web? This artificial distinction will just muddy the waters and make for an unnecessarily complicated set of rules (and loopholes...).
Having said that, the following should be made available in several languages: - Sites on services and documentation that directly affect citizens (health, etc. as stated before), as those can be directly accessed by them - Sites that provide access to grants, funding, etc. so that there is a level playing field in this regard across the Union. Applications to those funding sources should be acceptable in several languages, by the way. The current practice of using English as a Lingua Franca, while understandable (I myself am not a native English speaker but am replying to this questionnaire in English, since even if I switch to Portuguese, ironically enough, the questions are presented to me in English...) provides an undue advantage to native speakers (and other such as I).
5. Would it be helpful to have summaries of key issues published in all or many official languages?
As can be implied from the above, yes. Actual *key* issues should be available not only as summaries. All others should have a summary/abstract at least in the most encompassing subset of languages, ideally all of them.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

As stated above: the subset that maximizes the number of people that would be able to understand it, regardless of nationality of number of L1 speakers.

Also, very specialized documents, that are not meant for the general public, are more amenable to this, and in those cases the de facto languages in use in the several specialty fields should be used.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

While the historical and economic reasoning behind the use of those three languages is understandable, it is not in general adequate, in other situations beyond the "Priority Initiatives" that may also impact the citizen's life. It further creates an undesirable feeling of inequality ("some countries are more European than others... we're all members of equal rights but we'll have to culturally "submit" to the "strong countries").

This is why neutral languages such as Esperanto were created in the first place. The widespread use of such a language would be the best solution. Knowing that is unlikely to happen, the general rule should be translation to all languages, and limitations to that should be the exception (right now it feels the other way around: the default is to use EN, FR, DE, and in exceptional cases all of them).

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

It undoubtedly would. The world is very different from that of 1958. There are mass media, the Internet, people communicate across national borders much more (which is GREAT and helps make the European dream true!). On the other hand, everyone is doing it. As part of a truly unified Europe, communication must be a level playing field. This is why mobile phone roaming fees were abolished. There should not be a "language fee" as well... As such, the legislation should be updated to ensure equal access to information to all EU citizens, in a context much wider than the original Treaty of Rome...

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

This is a key European issue. As such, and as part of an all-encompassing EU policy, this should be paid out of the EU's general budget.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

There have been significant advances in this area in recent years. This can serve as a solution for non-critical documents.

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Contact Information

Title, Name, Surname:	Professor Daniel Gonçalves
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Country of residence:	Portugal
Language of the contribution:	en - English
Other language in which you would agree to receive communications:	pt - português
Category:	Individual citizen
Category: [Other]	
Your reply:	can be published with your personal information (personal email addresses are not published)
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Survey response 129

Response ID
5424
Date submitted
2018-09-06 16:25:00

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
One of the criteria should be on what the target audience is. If it is the general public then it should be in all the languages of the Union, if it is professional bodies/ institutions then the 3 or 4 main European languages should be sufficient and could even be solely in English as English has become the defacto lingua franca of the world (I'd prefer French to have that status but that's a different subject).
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Yes every institution should have such a policy. It should outline in what languages it intends on communicating with its "customers" and outline what criteria it will apply in the translation of its materials into other languages of the Union.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
Yes every institution should have such a policy. It should clearly outline what criteria need to apply for it to make a translation available on request and should someone really want the particular information in their language provide a cost estimate for such a request. This does not have to involve any human interaction. Take the source document, count the number of words and multiply by the cost per word for a translator. This would give a clear indication of the cost of translating things in multiple languages and therefore possibly limit the number of requests for translation.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
All institutions' websites should be available in all of the Union's languages that is the main page, the contacts, and the language policy pages. After that, whatever languages are set-out in the policy need to be represented on every page of the site, blog posts, press releases, articles, documentation...
5. Would it be helpful to have summaries of key issues published in all or many official languages?
Summaries are very useful to determine the relevance of a particular item to the reader, the more languages summeries are made available in, the more accessible the information becomes. However, one should not be afraid of using automatic translation tools for the generation of such summaries. If there were means for the visitors to propose corrections of the translations that would involve the Union's Citizens in the institutions and enhance the relationship between them.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
Yes. Not everything needs to be translated into every language. However, if it does apply to the general public, then it does need to be made accessible to all. So professional bodies/members can access information in one of the major languages in the Union. But "joe Average" should not be expected to know any other language than their mother tongue.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

Yes that seems to be a good approach to limiting the expenditure.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

I would leave it to the institutions to decide rather than imposing a more complex legal framework. The 4 main languages of the Union should provide a good starting point from which technological solutions such as community driven translations could be implemented.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Rather than demanding professional translations for everything, offer community involvement. Let the Citizens help with the effort. If someone is really anxious to know what a certain document says then a basic automatic translation can be given and from that, Citizens can contribute corrections to the translations.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Yes. I have been outlining that idea in previous answers before I even saw this question.

The machine translation can be enhanced by the Citizens of the union themselves. When people have an opportunity to contribute to society in a positive way, they generally rise to the occasion.

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0

Contact Information

Title, Name, Surname:

Mr, Jea, Rubillon

Organisation:

Country of residence:

Ireland

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

fr - français

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 140

Response ID
5927
Date submitted
2018-09-12 09:12:13

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>Official documents or communication to the general public should be available in all EU languages.</p> <p>Documents with specific technical content or on specific issues concerning only one or a few member states, could be published only in a smaller number of languages. To clearly express the multilingual character of the EU, publishing documents in only 1 EU language, should always be avoided. German, French and English seems to be a reasonable minimum set, as it is currently used for internal documents of the European Commission.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>The EU as a whole should have a transparent policy on its use of languages in all of its institutions and programmes. This generic policy needs to set guidelines, which have to be further specified when applied by the individual EU institutions. These individual institutions should also transparently publish their specific application rules of the language policy.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>Having the ability to communicate in one own language which the institutions that govern you is a fundamental prerequisite of democracy. With the current limited levels of proficiency in other EU languages most member states, documents should be made available in any EU language, upon a motivated request.</p> <p>The best way to decrease the total costs of translation on the longer term, is to invest more in language education. The current goal of teaching the mother languages plus at least two other EU languages to all EU citizens, is far from being reality. If the EU institutions would foresee to limit the amount of languages used in the institutions in the longer term, it is necessary to ensure that all EU citizens are given the possibility to reach high proficiency in at least one of the available languages within the public school system. The propaedeutic value of teaching Esperanto (https://en.wikipedia.org/wiki/Propaedeutic_value_of_Esperanto) is a valuable technique that should be employed more to improve the success of teaching foreign EU languages.</p>

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p> <p>See question 1: Official documents or communication to the general public should be available in all EU languages.</p> <p>Documents with specific technical content or on specific issues concerning only one or a few member states, could be published only in a smaller number of languages. To clearly express the multilingual character of the EU, publishing documents in only 1 EU language, should always be avoided. German, French and English seems to be a reasonable minimum set.</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p> <p>Whenever detailed documents of a certain issue have not been made available in all EU languages, availability of summaries in all languages is a good tool to ensure at least partial accessibility for speakers of other EU languages.</p>

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

Because of the very big differences in number of speakers between the different EU languages, it seems reasonable to apply some kind of hierarchy.

The minimum set should be at least the current three 'working languages' of the European Commission: German, French, English. In some cases, a set of 6 languages can be useful: German, French, English, Italian, Polish and Spanish. This set of the 6 biggest languages has the advantage that it also covers the 3 biggest language families of the EU (Romance, Germanic and Slavic), which reduces the necessary effort for many of the EU citizens to reach at least good passive understanding of at least one of them.

In most cases, all EU languages should be used. Ideally, this set should be further expanded to include significant regional languages inside the EU that are not a national language of one of the member states (Catalan, Basque, Occitan, Sardinian, Friulian, Silesian, Bavarian, etc.).

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

This policy seems to go in an acceptable direction. An important factor is that the interpretation of 'broad public interest' is really large. Any exclusion of languages causes discrimination against a part of the EU population, which must be avoided whenever possible.

A further intermediate set of 6 languages (German, French, English, Italian, Polish, Spanish) can be useful.

The best way to further improve the accessibility of communication to more EU citizens, would be to add a neutral language to the available languages in all cases where certain EU languages are left out. When choosing a neutral language, the required learning effort should be an important criterion. Esperanto saves roughly 90% of the learning effort and thereby greatly improves the possibilities for EU citizens that speak smaller EU languages to access EU communication, when communication is made available in that language.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

It is absolutely necessary to anchor language policies in a firm juridical framework. Every choice to employ or not employ a certain language creates palpable discrimination against a part of the EU population and privileges another part. To respect the democratic values of the EU, this should of course be avoided wherever possible.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

See question 3:

The best way to decrease the total costs of translation on the longer term, is to invest more in language education. The current goal of teaching the mother languages plus at least two other EU languages to all EU citizens, is far from being reality.

If the EU institutions would foresee to limit the amount of languages used in the institutions in the longer term, it is necessary to ensure that all EU citizens are given the possibility to reach high proficiency in at least one of the available languages within the public school system. The propaedeutic value of teaching Esperanto

(https://en.wikipedia.org/wiki/Propaedeutic_value_of_Esperanto) is a valuable technique that should be employed more to improve the success of teaching foreign EU languages.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation can be an ever increasingly valuable tool to assist the translation process. However, a 'human eye' remains absolutely necessary to guarantee quality of the translation. Increased use of machine translation can reduce costs, because more texts can be translated against the same budget. At the current state of machine translation, however, it should be unacceptable to publish official documents or communication that has been machine translated without correction/approval by a skilled translator.

Further research in the machine translation field could go in the direction of finding out which language functions best as a 'pivot' language in multilingual translation demands. That means, which language gives the best result when used as an intermediate translation step between two languages for which direct translation is not available (which is very likely, as with 24 language, there are 552 language pairs).

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[{ "title": "L'enseignement des langues comme politique publique", "comment": "Report about different scenarios of language education policies on the EU level", "size": "800.639", "name": "Raporto%20Grin.pdf", "filename": "fu_ykcwecy8fe9sjja", "ext": ".pdf" }]

filecount - If you want to upload any further documentation, please use this field.

1

Contact Information

Title, Name, Surname:

Nico Huurman

Organisation:

Country of residence:

Slovenië

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

nl - Nederlands

Category:

Individual citizen

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 143

Response ID

5964

Date submitted

2018-09-12 21:33:23

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

Esperanto alone would do the trick. its very easy translatable for everybody's media and if no media are available most of the people in the world will recognize a lot of words or be able to detect the meaning when knowing a small vocabulary of Esperanto
--

5. Would it be helpful to have summaries of key issues published in all or many official languages?

summaries always very helpful, in many different languages.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

i would always chose for Esperanto. The money saved can be used for excellent translationprograms on everybody's phone.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
--

yes i think that is good policy. Add Esperanto (for familiarizing purpose)
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

better outside a detailed legal framework. Is way too inflexible.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Nobody wants to read a lot of stuff on a meeting day. But it is necessary that the total amount of detailed information exists for the few professionals who fully read it . Use esperanto and let everybody translate it at home, where the quiet reading starts

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Esperanto takes away all these problems

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0

Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

the Netherlands

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

nl - Nederlands

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 157

Response ID
6060
Date submitted
2018-09-18 10:06:06

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>Anything sponsored from the public purse has to be transparent including the language policy of the institutions.</p> <p>If the EU respects its linguistic diversity and wishes to communicate to all EU citizens it is time for the EU to start using all European languages including 'regional' and minoritised (RML) ones, not just the official languages. RML speakers comprise 50 million people, 10% of the EU population, it is unacceptable for the EU to continue to ignore the rights of these speakers regarding using their own language with the EU. RML speakers can work together with the EU to help in this aim and to work out certain contexts where RML provision is particularly needed, then work towards comprehensive provision. The EU's Member State language-only policy is out of date and needs to be dropped so as to help protect and promote all European languages and to provide a sense of equality between peoples and cultures.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>Yes. The EU has to look at how it manages European language diversity and develop a policy that is equitable for all European languages and that doesn't exclude certain languages over others.</p> <p>While there are all the ingredients for a holistic EU language policy there is still no recipe. It is time for that recipe to be written. Regarding what should be included in an EU institution's language policy, we would recommend that the EU looks at how various states (eg. New Zealand, Canada) are approaching the management of their linguistic diversity and the expertise on the subject. Prof. Colin Williams (Univ. of Cardiff), for example, has written extensively on language diversity management. There is not enough space here to discuss in detail what should be included in an institution's language policy. The NGO Platform on Multilingualism 2011 report made several recommendations (see attached) and there's ELEN's recommendations for RMLs (see attached). One suggestion is for the protection and promotion of European languages to be upgraded from an EU core value to a core principle. We would like to see a formal discussion opened with the EU on what its language policy should look like in the 21st century.</p> <p>Yes, institutional language policies will need to be published online.</p> <p>If languages are to be restricted the EU will need to explain to the citizen as to why a certain European language is excluded or has poor provision and why their rights are being infringed upon.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>Yes.</p> <p>The policy could be framed in the terms of 'active offer' where the institution offers to provide translations in any European language when requested. We're not aware of what the current demand for translation of documents is so as to ascertain what the costs should be. Currently requests for Welsh translations are sent to Wales to be translated and then sent back. The Welsh Government pays for this. The current cost for EU citizen per year is 2.2 euro which is minimal considering the service provided, a slight increase in this would be enough to enable the EU to offer information and document translation and some of its services in all European languages, including RMLs.</p>

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

RESPECT FOR LINGUISTIC DIVERSITY should be the overarching language principle, so that websites have information in all European languages not just official Member-State languages. It appears to have been forgotten by the EU that 'regional'/minoritised language (RMLs) speakers, who number 50 million (10% of the EU population), are also paying into and working for the European project - EU websites should reflect this and have content in these languages. It may be necessary that only static content can be published in RMLs giving a tokenistic recognition at first, but this would still be a huge step forward compared the languages available now.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

In all State languages and all European RMLs as well.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

Surely that depends on 1) the budget available for translation and 2) the political will on whether or not to use all European languages. So far the EU, because of its arbitrary and restrictive language policy on Member state languages only, is in the position where it supports the language of micro states such as Malta or Cyprus but ignores 10 million Catalan speakers. Furthermore it depends on the audience. For example, many Welsh farmers will need the Common Agricultural Policy in Welsh, not in English.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

The EU has to drop its State languages only policy and include all European languages, state, sub-state, and regional or minoritised. If not, it is not respecting or supporting linguistic diversity. How much it uses all of these languages is a separate question but the principle should be that the EU is telling citizens that it is able (re. active offer) to produce documents in Basque or Breton for example. The EU has made some moves in this direction with its ability to produce some documents in Basque, Catalan, Galician, Scots Gaelic, and Welsh. There is no reason why this service couldn't be extended to cover all RMLs.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Since 1958 there have been profound language changes in Europe. RML communities and linguistically diverse states are learning more about managing their language diversity. In that period we have also found that without legislation we will have little success in maintaining or revitalising our languages.

ELEN's own recommendations (attached) for EU measures for RMLs include the following:

1) EU-wide framework to protect and promote RMLs using existing mechanisms. Including the proper implementation of the ECRML and FCNM where it has been ratified accompanied with sanctions (e.g. infringement proceedings) from the EU for lack of implementation.

2) Language discrimination is a form of racism, recognition of RML rights as a fundamental right. The ECRI (Council of Europe) Recommendation 7 stipulates that language discrimination is a form of both direct and indirect racism. Ensure that the scope of discrimination covered by the EU under Article 10 of the TFEU, currently including discrimination on the grounds of race, includes language discrimination, and that this is included as a fundamental rights issue.

3) EU infringement proceedings for contravening Charter Fundamental Rights (CFRts). Ensure that the EU is both empowered and motivated to take infringement proceedings against states in cases of language discrimination.

4) EU Language Commissioner and language rights observatory. Canada, Ireland and Wales all have language commissioners who work to ensure the protection of language rights.

5) EU Language Plan, to be adopted by States, that meaningfully promotes equality & usage.

6) EU Directive on language rights and the abolition of linguistic discrimination against RMLs. If the EU can protect birds, fish and plants, why can't it protect Europe's RMLs and endangered languages.

See also the 2011 Civil Society Platform for Multilingualism Recommendations (attached).

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

But what is the cost per EU citizen for translation, just over 2.2 euros per year (in 2013)? What's the cost of a wing of a fighter jet or 100 metres of motorway per citizen? I know that we would rather have more languages. The EU functioning in 24 languages is a remarkable achievement but we can do more. All RMLs could be adequately covered with a slight increase on the 2.2 euro per year, and what a strong signal of support it would send to those RML speakers that they are recognised and included in the EU project.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Language technology is developing fast as well as digital provision in all languages. Currently we are working on the Digital Language Diversity Project (DLDP) (see the Road Map attached) which is aimed at increasing digital provision for endangered European languages so that they don't get left behind as more public services, health and education are digitalised. If RMLs are not able to keep up their speakers will be effectively excluded and marginalised further. The EP has just passed the Language Equality in the Digital Age Report (see attached) which addresses these issues and which we contributed to. For us it is vital that the EU takes some action in this field and implements the Report, particularly extending and enlarging the DLDP. While it is beyond the EU's competence to interfere in domestic state language policy it is now able to be proactive in helping us improve digital provision not only for RMLs but for smaller state languages as well. We hope that the EU will seize this opportunity to substantively respect linguistic diversity.

If we are able to keep pace in terms of digital provision a lot of translation will be available in more European languages as well as being accurate, timely and economic.

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5

Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Belgium

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

ga - Gaeilge

Category:

NGO or association

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 162

Response ID
6104
Date submitted
2018-09-19 19:55:13

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
All information useful to the public in general should be available in all languages.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
In case there is a language policy, it should certainly be public, and very detailed.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
Translating information or documents into EU languages is a cost that relates to the core business of the EU. When compressing this cost, we are sapping the EU edifice.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
Everything that is of interest to the general public should be available in all languages.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
At the very least, in all official languages.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
This has been done, but I do not think it is acceptable whenever the material is meant for people outside the institutions (we insiders have an obligation to know different languages, so we should be the exception to the rule, not the example).

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
This is a first step, but not enough to give people enough information.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

There is a clear need for a legislative act establishing what the people of the EU are entitled to receive in their own mother languages.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

The EU budget should be planned keeping in mind that some costs relate to the core activity and cannot be dismissed without dismissing the sense of having a European Union. The new MFF can reflect this.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

"Machine" translation is not yet able to replace human translation, and it would be very dangerous to give to the public any translation that has not been checked by human eyes. No, this is not an acceptable price, it is a trap.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Luxembourg

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

en - English

Category:

Individual citizen

Category: [Other]

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Survey response 165

Response ID
6164
Date submitted
2018-09-19 12:05:14

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>In principle, information made available in one official language should be available in all official languages, with the possible exception of documents of a highly specialised/technical character, addressed at specific narrow groups of stakeholders. In the latter case, the set of languages should be limited to a small group of working languages (EN, FR, DE? or maybe just EN?) to minimise the perception that some languages are "more equal" than others ("why is this document available in XX, but not in YY"). Possible exception: documents directly relevant to some member state should also be available in the language(s) of that member state (e.g. in the case of Article 7 proceedings).</p> <p>I don't think a detailed set of criteria beyond these framework principles would be feasible. Surely, common sense would need to be used in more complex cases.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>Probably yes, assuming that differences across institutions justify the existence of such separate policies. As far as possible, such policies should be harmonised. A language policy should specify, in general terms what gets translated into what languages. I'm not sure whether it is possible to formulate detailed rules (it may be for some institutions but no for others), but whenever they exist, they should be included in the language policy. Such a policy should be published, as a matter of transparency.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>That would be risky, as it might generate disproportionate costs and bottlenecks, and might be used by an adversary to flood an institution with requests (in the style of Internet "denial-of-service" attacks). If such a policy is at all formulated, it should contain some safeguards (quotas of pages available for this kind of service, a reservation that translation will be done "subject to the availability of translation resources) and, most possibly some kind of requirement for the requester that the specific language version of the document is of immediate concern to them. But I would be generally wary about possible accusations of unequal or unfair treatment etc. and advice against offering such a service.</p>

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p> <p>This should probably left for the institutions to decide (in a possibly harmonised way), depending on their specificity. As a general rule, information intended for the general public should be available in all the official languages. If an institution produces some highly technical (and long!) texts addressed at narrow groups of specialists, than a single language version (EN?) or narrow group of versions in the "working languages" would be acceptable.</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p> <p>Yes, by all means!</p>
<p>6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?</p> <p>To be decided on a case-by-case basis. I am strongly against criteria related to the language communities themselves (risks perpetual discrimination of languages with smaller numbers of speakers). I'd rather use criteria related to relevance (is the text important for a given language community?) or to the procedural aspects (choice of languages limited to the "working languages" of a given institution).</p>

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

I'm not familiar with the details of this arrangement and the ways it functions in practice, but it looks like a reasonable compromise. I'm not sure what are the "additional languages" mentioned above: the choice of such "additional languages" may give rise to complaints (why is there a version in XX, but not in YY). I would stick to the principle that it is either all the languages, or just the "working language(s)" and/or the language(s) of those immediately concerned. Otherwise it looks like a good blueprint that other institutions might adopt/adjust to their purposes.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

I profoundly deplore the lack of serious legislation on linguistic matters and, in particular, the lack of de facto recognition of the multilingual character of the EU's legislative process and of the complexity and importance of translation in the context of a multinational and multilingual organisation. Yes, new good legislation would be extremely helpful, but can it be realistically expected? This subject may be a bit of a Pandora's box... But I do hope that when, at some point in the future, the Union's primary law is overhauled, language matters will finally find the place they deserve in the Treaties.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

The costs of translation are in the order of a couple of euros per EU citizen per year (comparable to the cost of a cup of coffee in a restaurant). Would it really be so difficult for the average European to cough up an additional 50 cents or 1 euro per year? I think the question should be reversed: what are the costs of non-translation? What is the price that we pay – in financial, economic, political, human etc. terms – for the unavailability of information in all the official languages.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

To say that machine translation is "not always fully accurate" is an understatement. True, machine translation may sometime provide surprisingly good results (especially when it is based on high-quality human input...), but elsewhere yields results that are nonsensical, gibberish, or – worse still – distort meaning in ways that are not easy to spot. It would be extremely risky to rely on translation provided by machine. On the other hand, information technology may and does provide invaluable assistance to translators, allowing them at the same time to increase the speed of the translation process and improve the quality of its final product. So the question is not how to replace the translator with a machine, but how best to exploit the man-machine synergies, which is a very promising area.

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Contact Information

Title, Name, Surname:

Organisation:	
Country of residence:	
Belgium	
Language of the contribution:	
en - English	
Other language in which you would agree to receive communications:	
pl - polski	
Category:	
EU institution	
Category: [Other]	
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Survey response 167

Response ID
6185
Date submitted
2018-09-19 12:10:13

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? The rule of thumb should be that if a certain EU tool is addressed to the citizens directly, it should be available in all languages. Websites informing about the activity of the institutions, press releases, EURES, the ombudsman pages, the EESC site, all public consultations should be available to everyone at all times.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? Yes, they probably should have a language policy, but publishing a very detailed document about it may not be the answer to the request of more openness. A short justification of the reasons for restricting choice of languages in certain cases should be sufficient.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? Public documents should be available in all languages anyway. Providing translation on request for specific information seems very much dependent on the content of the information. A policy of translation on request could be framed based on the criteria currently used to provide access to working documents, possibly requiring a reasoning on the part of the requesting party.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
5. Would it be helpful to have summaries of key issues published in all or many official languages?
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? It is a step in the right direction, but I believe budgetary constraints have been given a weight much superior to that of the need of informing the citizens.
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Though a better legal frame is desirable, it's probably a can of worms to negotiate in the current climate.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

I should propose transferring the obligation of communicating and translating initiatives and consultations to the member states. Their constant refusal of more administration costs at EU level makes it impossible to deal with the problem at the source of the texts, while political gain from framing EU-level policies as `outside` national governmental work remains high. It should be mandatory that each government has a department for communicating its own work within the EU structures and whatever is on the agenda at EU level - it can use the official translations of public documents where they are available and translate itself summaries of procedures for the national public.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

No. There are often too sensitive issues at stake. Machine translation is getting really good, but it is not yet that good for all languages.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Belgium

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

nl - Nederlands

Category:

EU institution

Category: [Other]

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Survey response 175

Response ID

6285

Date submitted

2018-09-20 14:40:31

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
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The existing notion of all official languages being equal is laudable, but the lack of transparency and rule enforcement have led to the current miserable level of linguistic inequality. Rules should be openly discussed and declared, and their ongoing application measured in terms of costs, linguistic equality/inclusion, and communication quality/fluency.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
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Each EU institution could have their own language policy that is a defined delta on a single EU-wide base language policy. The base language policy should call out mandatory and optional parts. The institutional language policies should certainly be published on the institutions' websites, allow for (multilingual) public comments on the website about the policy, and include automatically updated metrics on their website's conformance to the language policies.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

Yes. The policy should clearly indicate whether 1) no translations to be available, 2) summary translations on request (within a week), 3) summary translations on request (within a month), 4) full translations on request (within a week), 5) full translations on request (within a month). Institutions should avoid the practice of having early availability of translations in major languages, and late availability of translations in smaller languages, and "vapour/never" availability of translations in the least used languages.
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II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

Pages that strongly target the general public should be available in all official EU languages, and sites that relate to citizen health or wealth should also be available in all official EU languages. Sites that are more internal or technical could for now follow a more restricted form of multilingualism, but should be mindful of the risk of sliding into discrimination or loss of communication quality.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

This would be essential. Please be wary however of the phrase "all or many official languages" - it should best be written as "all official languages (and all these published more or less simultaneously)". If "trusted" translations of summaries could be made available in other languages beyond the official EU languages (eg sign/regional/Esperanto), for example for free by partnering with knowledgeable volunteers, then including or linking to these from the official websites should be allowed (or even encouraged) as a positive attempt at true and wide multilingualism.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

For material that targets the general population it is not acceptable to provide translations in only a small number of languages as this would be a strong form of discrimination. The perceived unfairness could bit by bit undermine the future viability of the European project - a long term solution must have a sense of fairness, and a sense of efficiency. The answer is certainly not to take a simplistic knee-jerk populist approach that a bit of Broken English will be good enough - that achieves neither inclusiveness nor fluency.
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III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

This kind of policy shows disrespect to a significant percentage of the EU population. It saves pennies today (some translation savings), but risks pounds tomorrow (breakdown of EU-wide citizen cohesion). It favours the native speakers, and the money and time rich, and the language savvy, but it creates second class citizens who struggle to achieve active and sufficiently advanced fluency in English/French/German, and even creates third class citizens who are excluded almost completely despite partial/token translations into their lesser used languages. Ideally, as a slowly phased-in one/two generation European grand project, an easy-to-learn language (such as Esperanto) that is optimised for neutral and precise international communication should be chosen for when the use of a national language is inappropriate.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Without new legislation the EU may sleepwalk into an English (USA?) or French/German (EU27!) policy by default. A detailed legal framework would be helpful in preventing this restriction of languages, but only one that has been carefully considered (by intergovernmental discussions including input from NGO's and diverse experts) and with a desirable long term goal in mind (for a just and efficient communication system for everyone).

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

There are novel methods of saving money, for example the Grin Report (Université de Genève) mentions an eventual €25 billion ("L'enseignement des langues étrangères comme politique publique"). Such ideas should be openly and objectively considered despite pressures from those with vested interests and prejudices who would prefer to remain with the status quo.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Sometimes machine translations are better than nothing, but sometimes worse than nothing (for example in health or financial documents), so citizens should have the confidence that titles and summaries are always human translated and so of good quality.

On the other hand, beyond summaries, a full document could have an option for machine translation to enable a "taster" of the contents (at which point the reader would have the choice of requesting a translation by a human translator). For websites that have commenting/discussion sections, these could be made multilingual and so more inclusive of all citizens by employing machine translations of contributions which would sit alongside the originals.

Although many people claim to have knowledge of English/French/German, active fluency use can be challenging, and the increasingly capable machine translation technology can now rival some inarticulate attempts at expressing oneself in a difficult national foreign language. (It's also worth noting however that there are charges for some machine translation, for example translate.google.com, but others seem to be free for example www.apertium.org.)

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Contact Information

Title, Name, Surname:
██████████
Organisation:
Country of residence:
Northern Ireland
Language of the contribution:
en - English
Other language in which you would agree to receive communications:
fr - français
Category:
Individual citizen
Category: [Other]
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Survey response 179

Response ID

6299

Date submitted

2018-09-20 16:44:44

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
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3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The websites should be available in all official languages. At present, large parts of Europa are only available in English, which is appalling given that it is highly likely to be most people's main source of information about EU activities.
--

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Yes, all languages. This should go without saying.
--

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
--

It is in the nature of a public consultation that it must be accessible to 'the public'. All consultations must therefore be available in all languages to enable people to access them regardless of nationality or level of education.
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Yet more legislation should not be necessary.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

From elsewhere in the EU budget. Massive cuts have been made to DGT in recent years and it's about time this was turned around. Quality translation costs money and the institutions need to accept that reality.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

To say that 'machine translations may not always be fully accurate' is a huge understatement. Modern machine translation systems have a habit of missing out key words, such as 'not', and certainly cannot be relied on for public information. It is never 'an acceptable price to pay' if the document is gibberish or doesn't say what the original said.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Belgium

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

fr - français

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 186

Response ID
6372
Date submitted
2018-09-21 12:41:00

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Any criteria used in deciding which language(s) to use in particular contexts would cause discontent towards the excluded.

To fill the gap in an economic, fair and effective way, I propose to leave the choice of language free, but with the obligation to add one bridge-language that does not favour/penalize any of the EU countries.

The English language is not official in any EU country, so it could sound like a neutral and equitable bridge-language, but English is mother tongue in non-EU countries, such as the United States, Australia or the United Kingdom, therefore it places Europe in a position of dependence and weakness with respect to the other powers.

Paradoxically, the current prevalence of English in Europe benefits the extra-Europeans penalizing the Europeans themselves, for example a document written in English would be better understood by an American than a Spanish.

In conclusion, I believe that the current gap can be filled by introducing the Esperanto language as a second language for the different sections of the EU administration while retaining the right to freely choose the first language.

For example, a document originally written in French could be translated in Esperanto and English, reducing the burden to 2 translations instead of 23.

The Esperanto language allows us to achieve three fundamental objectives:

- reduction of translation costs;
- fairness in access to information from EU Member States;
- autonomy and independence from powers outside the EU;

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

Considering the importance of languages in human communication, I believe that every EU institution should absolutely have a language policy. This policy must first of all be pragmatic and must allow to be adopted easily in a short timeframe and at low cost.

The language policy must certainly be published on the websites of the institutions, being the Internet the most widespread means of communication.

In specific cases where the choice of languages is limited, I suggest to keep the current policy, but with the obligation to add one bridge-language, which must be neutral and easy for everyone.

The Esperanto language has these characteristics, as well as being easily translatable automatically (Google Translator already handles it accurately).

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

Translation of documents is extremely expensive, especially if the languages are 24.

I suggest that the translation policy does not depend on the circumstances, for avoiding discords on which circumstances to consider.

A relatively economic and fair policy may be that of provide, upon request, the translation in Esperanto for any circumstances.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The general language principle to be applied to the websites of EU institutions should be the right to equal opportunities for all EU citizens, respecting the dignity of all Member States, large or small, wealthy or less. Considering the enormous cost of translating institutional websites into 24 languages, I suggest translating them in Esperanto (besides limited appropriate languages). For example a website originally implemented in German could be translated into English and Esperanto, reducing the burden to 2 translations instead of 23. The Esperanto language, being second language for all (even outside of Europe), concretizes the right to equal opportunities for all and respect for every culture.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Publishing summaries is dangerous, because of the risks of discrimination between people who have access to the whole information and those who have access to the summaries only (obviously less informative). I think it is less discriminatory to publish fundamental questions in a neutral language, without carrying out any synthesis.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

It is certainly acceptable to limit the number of languages, for sustainability costs and times. However I consider dangerous choosing some national languages, because this introduces a discrimination between strong and weak countries, in other words this facilitates the power of some countries penalizing others. The current practice of English as a bridge-language between non-Anglo-Saxon nations might seem reasonable, but it puts Europe in disadvantage position compared to the countries where English is mother-tongue and forces Europe to absorb the extra-community culture rather than cultivating the identity of its member states. It is better to choose a bridge-language that is not a mother-tongue of anybody, like Esperanto, thus putting Europe on a level of equal dignity compared to the rest of the world.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

In my opinion, this policy is unfair to the countries having difficulties with the three main languages. It is also dangerous because the summary of a publication contains less information than the original, so it can give rise to misunderstandings. To respect and support both linguistic diversity and budgetary constraints I suggest translating once publications from the original language to a bridge-language, which is neutral and second-language for everyone, such as Esperanto.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Communication between people has always been paramount importance and nowadays, with modern technology, communication must be aligned with the times.

The 1958 legislation is obsolete and no longer acceptable in the context of 24 official languages.

Language issues must be dealt inside a detailed legal framework and must be addressed by Community legislation, in the same way as other issues in which Europe has shown that it can be in line with the times, such as the European telephone roaming, the General Data Protection Regulation and the adoption of Euro as a common currency.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Europe risks succumbing to the burden of excessive translation costs, losing competitiveness towards the other world powers, more streamlined and dynamic.

The idea of translating documents into all EU languages is based on respect of equal opportunities for all Member States, but this objective is easily and economically reachable using a bridge-language instead 24 national languages.

Translating documents into one single bridge-language like Esperanto (keeping the version in the original language), you get three advantages:

- reduce costs;
- respect equal opportunities for Member States;
- maintain competitiveness and identity with respect to external powers.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Automatic translations are dangerous, because they can change the real meaning of the texts without our knowledge.

It is not acceptable to have "wrong" documents just to save the costs of translation.

It is safer and more accurate to reduce translation costs to a minimum, avoiding the translation into 24 languages, but translating the documents only once into one bridge-language, like Esperanto.

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Contact Information

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Alessandro Mazzetti

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Country of residence:

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Language of the contribution:

en - English

Other language in which you would agree to receive communications:

it - italiano

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 197

Response ID
6507
Date submitted
2018-09-24 10:54:00

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>Given the scope of the European Ombudsman's mandate, the consultation focuses on the use of languages between the European institutions and the European citizen, in both political and administrative contexts (the latter including economic information such as the language of forms used in novel food applications). Beyond this context, however, the consultation offers a unique opportunity to pick out as a central theme the language policy — or the absence thereof outside the mandate of Article 165 TFEU — of the European institutions. It is laudable that the EU supports multilingualism, but when it comes to the use of language in the <i>acquis communautaire</i>, fresh thought is needed to develop a coherent language policy that applies across all sectors of the EU's activities. The recent "European Parliament resolution of 11 September 2018 on language equality in the digital age" points in the same direction.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>Aside from the European judiciary, where French is the long-established language of choice, the other European institutions could start a process leading to the establishment of a real language policy. Such a process would take as a starting point for setting the languages to be used not the various institutions, but the area of Union law and policy in question, and how it affects European citizens: politically, legally, administratively, culturally, educationally, economically.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>No observations</p>

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p> <p>No observations</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p> <p>No observations</p>
<p>6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?</p> <p>No observations</p>

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

It appears that it does strike the right balance. However, before definitively judging this policy approach, it would be advisable to gather empirical data on to what extent these guidelines are actually followed in practice and to what extent, in consultations, linguistic diversity (that is, the opportunity to respond in a variety of languages) is made use of by citizens and stakeholders.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

60 years after the adoption of Council Regulation No. 1 of 15/4/1958 (based on what is today Article 342 TFEU) the moment may have come to reflect on a true European language policy — in politics, in EU law and administration, in education, in culture and, not at least, in the internal market — that goes beyond what is today defined as language policy. The reflection should include general internal market policy including government-to-business (G2B) and business-to-government (B2G) relations as well as business-to-business (B2B), and business-to-consumer (B2C) relationships. On the latter this response to the consultation will contribute to the debate by simply listing what has been said and done on the use of language in B2C-relations (in attachment).

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

No observations

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that “machine” translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

No observations

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Contact Information

Title, Name, Surname:

Jens Karsten

Organisation:

bxl-law

Country of residence:

Belgium

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

de - Deutsch

Category:

Other

Category: [Other]

Law Firm

Your reply:

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Survey response 199

Response ID
6511
Date submitted
2018-09-24 12:18:10

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>In my view, there should be one universal criterion: All information should be published in language(s) understood by the target audience. "Target audience" shall be everyone with a legitimate interest on such information.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>Yes. The language policy should encompass the above rule. The policy should indeed be specific about cases in which the choice of language(s) is restricted; in this matter, said policy should also include an effective appeal mechanism whereby anyone who can demonstrate a legitimate interest can request a translation into an additional language.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>Yes. The policy should provide anyone who has a legitimate interest in the document/information in question with an effective mechanism of obtaining a translation into a language they can or can be reasonably expected to understand.</p> <p>Depending on the actual strength of the legitimate interest, the translation may be provided for a fee to cover the actual translation costs. Once this translation is made, it should be made available to anyone else free of charge and by the same means (e.g. at the same website) used to obtain the original version of the information/document.</p> <p>The strength of the legitimate interest can be distinguished along these lines:</p> <ul style="list-style-type: none">- documents/ information relevant to proceedings touching upon the fundamental rights of a physical person: translation into any language in the world can be requested, free of charge to the person concerned- relevant to the everyday life / business in the EU: should be automatically available in all official EU languages; other languages upon request and for a fee- relevant to everyday life / business in some MS only: automatically available in the official languages of those MS; others upon request and for a fee- relevant to a specific sector, or for persons seeking a certain advantage (job applicants to institutions, enterprises bidding in a tender): only languages commonly used in such situations (e.g. OK to publish a telecommunications tender in English only), other languages for a fee or not provided at all

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p> <p>Everything that is relevant to citizens in all EU member states should be available in all EU languages. Any other option undermines democratic legitimacy and public perception of the EU.</p> <p>For information relevant only to certain MS or certain sectors, information can be limited to official languages of those MS / languages commonly used in that sector.</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p> <p>Yes, in all languages.</p>

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

See previous answers. The general principle should be that material should be always provided in languages understood by the target audience.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

No. Public consultations, by their very nature, are targeted to EU citizens / businesses in all EU member states. Therefore, they must be published in all official languages. Any reduction undermines the democratic legitimacy of the EU institutions and violates the fundamental right of every EU citizen to be involved in decisions that affect him/her.

It is not for the Commission to decide which issues are of "broad public interest" and which are not. The institutions have no right to pre-emptively exclude citizens from the policymaking process on the basis of language knowledge.

The best way to reduce the administrative and budgetary burden on the institutions would be to reduce the scope of issues they deal with. Despite proclamations on being "big on the big things and small on small things", EU institutions are still regulating many areas that should either be left unregulated, or left to the discretion of the Member States.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The main principle - that everyone has a right to address the EU institutions in any official language and receive a reply in the same language - is still valid.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

First and foremost, the EU institutions should reduce the scope of their activities. This will reduce translation costs.

All other increases in translation costs should be met from the EU budget. That is the cost of democratic legitimacy.

There are many ancient policies that should have been drastically reformed decades ago - such as the Common Agricultural Policy which nowadays does much more harm than good. Yet it consumes a significant part of the EU general budget.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation can be used for information only. The public should not be forced to rely on unreliable translations just because the EU institutions waste tons of money e.g. on the CAP at the cost of important things such as translation.

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Contact Information

Title, Name, Surname:	
Organisation:	
Country of residence:	Czech Republic
Language of the contribution:	en - English
Other language in which you would agree to receive communications:	cs - čeština
Category:	Individual citizen
Category: [Other]	
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Survey response 201

Response ID

6521

Date submitted

2018-09-24 14:34:02

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
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2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
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3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

5. Would it be helpful to have summaries of key issues published in all or many official languages?

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
--

I think this is a good initiative and I appreciate the concern about reaching EU citizens on important issues. It strikes as right a balance as one can hopefully try to aim at. Other EU institutions could be usefully inspired by the reflection.
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The 1958 settlement has the merit of being totally unambiguous and very general at the same time. Nevertheless today's EU is a different creature and new legislation could be helpful.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

These costs are not exorbitant compared to other costs in the EU budget. They should be covered as they are currently covered. What should be done - in my view - is to engage in a real reflection with the services responsible for translation in the various EU institutions in order to think how translation is used, how it has evolved and what is now possible and needed in the EU. The purpose of this reflection should be to provide the most appropriate service needed by EU and not the goal to save costs. A holistic approach is necessary on what the role of translation is; translation is not a necessary evil, it is part of the democratic identity of the EU and this should not be quantified; at least no more than all the other attributes of the EU.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation is not yet the panacea, so this discussion is premature as a "blanket" solution; using machine translation for some pairs of languages and not others has implications on quality of treatment and should be very carefully analysed. This is an issue that can only be tackled by the experts.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Language of the contribution:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 209

Response ID
6588
Date submitted
2018-09-27 10:21:44

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p>
<p>With so many official languages, translating everything by default is not feasible. Some possible criteria include:</p> <ol style="list-style-type: none">1. The population affected – is it absolutely necessary to translate a 4-page petition on the “treatment suffered by a wild bear wearing a defective collar” in Poland into Maltese?2. The level of detail – e.g. a summary could be available in all languages, so that interested citizens can gauge if a text is relevant to them and request translation of the full version. I will refer to this later as layered communication. There can be more than two layers, with increasing levels of detail. For the above-mentioned petition, it would suffice to state the subject of the petition (0,1 page), potentially the summary (0,5 page) and the concluding decision of the Commission (0,07 page) – this is 15% of the whole document. Full translation would only be needed: into Polish by default (population affected) and into other language(s) if requested either by MPs or citizens.
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions’ websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p>
<p>There should definitely be a policy, indicating what is available in each language by default and how to obtain additional translation. The policy (and the user interface) should be as uniform as possible for all institutions.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p>
<p>Yes. All citizens should have the right to obtain information in their own language. However, if this possibility is offered, but at the same time the amount of text translated by default is reduced, the end cost may not be disproportionately high after all.</p>

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p>
<p>Contrary to the current practice, highly sophisticated texts such as legal acts in their entirety may be less relevant to the general public. On the other hand, one should investigate ways to keep the general public informed about important developments in simple language, and this information should be available in as many languages as possible. This is not only about the translation but about general approach to communication. The aim should be to minimise exclusion resulting from limited access to information.</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p>
<p>Absolutely! One should investigate ways to keep the general public informed about important developments in simple language, and this information should be available in as many languages as possible. This is not only about the translation but about general approach to communication. The aim should be to minimise exclusion resulting from limited access to information. Simple format (e.g. questions and answers, animated graphics) can be used more widely, and requires less translation.</p>
<p>6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?</p>
<p>The main criterion could be the group affected. It is also necessary to strike the balance between the desire to reach possibly many people within a given territory and the feasibility of providing translation into a number of languages to cover also internationally mobile workers, or even migrants. This could be achieved by investigating the outlets that are likely to be used by respective groups, and tailoring communication as appropriate.</p>

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

This policy is going in the right direction. An efficient and fair solution requires layered communication – at a high level of detail in all languages, and more detailed and more specialised – in a limited number of languages. There can be more than two layers, with increasing levels of detail. This model seems definitely worth pursuing. Simple format (e.g. questions and answers, animated graphics) can be used more widely, and requires less translation.

Another area for improvement is the quality of translation. Often texts written in a (relatively) simple language in English end up sounding sophisticated, technical or clumsy in the source language (the Polish translation of the introductory page to this survey being one example). One reason for this is the widespread use of computer-assisted translation tools where each sentence is translated separately, which is detrimental to the flow of the whole message. For shorter messages addressed to the general public translators should be free to amend the text so that it is fit for the audience.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The linguistic landscape has changed dramatically and the old policy doesn’t fit anymore. One should adopt a more pragmatic approach, with targeted and layered communication. But if a new policy is not enshrined in a legal act, it is likely to be ignored. It does not need to be detailed but rather outline a general approach.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

If the whole system is reformed, with targeted and layered communication, there may be no or little additional costs. If the solution is to publish summaries and enable citizens to request translation of full documents, it will be easy to identify which languages are sought, but not which country the requester comes from. So “individual Member States involved” principle might not work.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that “machine” translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

I am a translator at European institution. We have just finished testing several machine translation tools. None has provided fully reliable output. But they can certainly speed up the translation process.

However, more sophisticated neural tools are being developed, and their reliability is improving. A selected tool might in future be embedded on institutions’ websites for gisting purposes, with all caveats and disclaimers regarding its reliability.

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Contact Information

Title, Name, Surname:

[REDACTED]

Organisation:
[REDACTED]

Country of residence:
Germany

Language of the contribution:
en - English

Category:
EU institution

Category: [Other]

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Survey response 210

Response ID

6594

Date submitted

2018-09-25 17:53:58

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

5. Would it be helpful to have summaries of key issues published in all or many official languages?

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
--

Yes, this sounds like a reasonable policy, however, regarding Public consultations of "broad public interest" - shouldn't these also be available in all languages? Why only "additional" languages? How will it be decided which the additional languages should be? Frankly, it's a waste of money to publish public consultations in any language if hardly anybody gets to know that they are happening. Where are they advertised?

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Yes, I do think that new legislation would be helpful. Otherwise language issues may be decided with very little transparency and perhaps too much subjectivity, according to changing needs and circumstances.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

I think that the additional funding should be partly from all the Member States, not just "the Member States involved" - how is that fair? And partly, from the EU budget .

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Well, I think that inaccuracies in machine translations are commoner than one might think and are a very high price to pay. They could bring the whole EU edifice tumbling down, because communication among peoples is a cornerstone of peace and stability, and people feel respected when they find that somebody has taken the time and trouble to translate things accurately into their language. It depends on priorities. If the saving of money is the most important thing, as seems to be the case everywhere at present, then there's no more to be said, and the EU reverts to being a group of countries banded together for trading purposes only, and needing to communicate on trade, therefore diversity of languages becomes less important. If the values of the founding fathers of the EU are to be remembered, I would not rely too much on machines to foster a sense of human unity.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

France

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

mt - Malti

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 217

Response ID
6629
Date submitted
2018-09-26 12:25:08

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p>
<p>It may be a unique moment in EU/European history in which one language can be chosen as the Lingua Franca of the bloc/continent. The USA did it a couple of centuries ago and this has been very succesful in uniting the Federation, fostering a common culture within all the diverse socio-ethnic groups and be much more practical. With Brexit round the corner, the EU's main English language speaking nation is leaving. It could be therefore an opportunity to choose the English language as the "main language" of the EU, without, so to speak, favouring any Member State in particular, which was something objections were raised against in the past. The other languages will still be there, of course, and should be encouraged to thrive, but one "main language" would lead to a more unified continent with for its main cultures that constitute it. It may be, after all, a catching up game by the EU Institutions, since in every EU country, as almost elsewhere in the world, the upcoming generation is already soaked in the English language be it in the education setting and/or in a more general cultural sense. This language already happens to be the global lingua franca, so why not making it the EU one too? Back in the day, it was the fall of the Roman Empire that cemented Latin as the lingua franca for a millenium to come and still to some extent now in certain specialised fields like chemistry, biology and lithurgy. Once Imperial Rome was gone, and it stopped "owning" Latin, everyone else got to adopt it, with great benefits to international communication especially amongst the learned classes. Brexit could be utilised to the same effect as the Member State owning English leaves behind it its language as a vehicle of European unity and further cultural cohesion within the EU. Undoubtedly, English would give the EU more clout and visibility on the international scene, if it makes the global language its own. The US makes full use of this and other (continued in the next field)</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p>
<p>(continued from the previous field) countries as far as Mongolia have realised this and acted upon it. I apologise for going a little off topic with this, but I thought it's relevant and topical to bring it up.</p> <p>2. Yes, each institution should have its own language policy. Translating everything blindly is both expensive and foolish, since not all documents are relevant to every member states (like railway material in languages of countries that don't even have railways!). Some texts are also addressed to a high level experts, who in this day and age would normally have studied at various locations abroad and would invariably speak English, wherever they hail from, so no need to be over-democratic here. I know of experts who prefer to read the English documents (often the originals) rather than the translations into their mother tongues, since all the books, terminology, studies and so on they take or encounter in their formative and professional lives are in English.</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p>
<p>3. Each institution should have a good look at all the types of documents it has had translated over let's say the past five years and then deduct which ones really needed to be available in all the official language, and which would suffice in EN, FR an DE or just EN. Then a policy can be draw on which types of documents to translate or not in the future. Requests should then follow the guidelines and any exception treated on its own merits (with the requesters giving their reasoned opinions why a translation is needed in this or that language, which may be valid arguments at times).</p>

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

4. Websites that deal with rights and obligation of every citizen should be available in every language, as much as possible. Also websites for school children - and then it's up to teachers to decide which language to use, the home language or EN. These should not be just translated, but also "localised", bringing examples and scenarios from the location where each language is spoken. Any global internet content service worth its salt goes through this process for proper appeal and relevance in different countries of the world.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

5. Yes.

When we say "many official languages", I would understand EN, FR, DE, IT and ES, which together have been found to reach at least 85% of EU citizens of all ages, and nearly 100% (thanks almost exclusively to EN) of anyone under 35 years of age.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

6. EN should always be there, whether the UK is or is not a Member State, since this is the language that is, by a great latitude, most profuse in the EU and the EU's anchor in the global community. If other languages are to be there too (but not all), then DE, FR, IT and ES come next since they cover not only their native speakers, but together with EN, most of the citizens in the other Member States (as second or third language).

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

7. Yes and no. One may argue that the more languages the better, but this continues to imprint upon Europeans a sense of a fragmented Union, that may not even be a Union at all in what matters most - cultural cohesion, which very much relies on knowledge of one common language (as in the US where many languages, even more than Europe, cohabit with EN as the commonly understood language, as is the case with varying success in other "large" places like India or Nigeria). Even Robert Schuman, if I recall well, once lamented for not having started with a Cultural Union instead of an Ecomonomic one...

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

8. The legislation in this regard dating back from 1958 is clearly outdated and has been strained beyond Hooke's Law. In the formidable time-gap since then, the world got globalised around English as it's main language, for both its communication and cultural needs. A new rule book is needed that will only necessitate translation into local languages when this is really needed and of use. In any case, languages such as Catalan with some 8 million speakers and Roma with some 4 million speakers, and many others (Basque, Welsh, Swabian, Luxembougish, etc. etc.), are not catered for, so the democracy argument falls on its head.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

9. I don't think there should be any additional volume of such documents - if anything the trend should be in the opposite direction. If it is some particular Member States that feel the need to demand documents in their respective language(s), then the costs should be met by them and not by every uninvolved EU taxpayer.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

10. For documents in which accuracy is not "make or break", machine translation is clearly the answer. Moreover, this technology is improving rapidly and can in some instances be more accurate than human translation (eg. in keeping with an established term) while human translators may translate more according to their whim. For legislative documents, which imperatively need to be accurate, the solution is that most of the legislation is DRAFTED WITH MACHINE TRANSLATION IN MIND. Training should be given to legal drafters about this. Since a lot of legislation is repetitive, this can be very useful, and the drafters should be able to identify which parts of their legal drafts are totally new (often a minimal part) - so attention by human translators is only given (and with a certain degree of emphasis) to those parts. (I am personally a professional translator, so I am shooting my own foot here, but then common sense should prevail).

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Contact Information

Title, Name, Surname:

[REDACTED]

Organisation:

Country of residence:

Germany

Language of the contribution:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 220

Response ID
6640
Date submitted
2018-09-26 14:55:20

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

5. Would it be helpful to have summaries of key issues published in all or many official languages?

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

Participation in the surveys requires obtaining expert opinions that are often hard to receive due to language barriers. For instance, in the area of secondary construction, consultations require information in the mother tongue. An internal translation and preparation of the most important information in German requires preparation time that is often not available due to the time limits for responses. Very often the translation of questionnaires is not or extremely late available, this causes a loss of time. The complexity of European evaluations is frequently too high and the questions are not specific enough. In order to receive concrete input, in particular from SMEs with limited capacities, the posed questions have to be reformulated in a simpler way and at the same time be more precise. This is even more essential when it comes to consultations on directives, since directives are implemented differently in each Member State, which, for instance, has an effect in the field of waste policy. In this case, falsifications of results can occur, if the questions are formulated too generally, because those subject to the provisions are familiar with the legislation of the Member States and not with EU directives.

A good study object for a better understanding of language-related difficulties is the chemicals legislation. Out of this area, we would like to present some examples:
see attached file!

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

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1

Contact Information

Title, Name, Surname:

Dr. Margit Maria Havlik

Organisation:

WKÖ

Country of residence:

Österreich

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

de - Deutsch

Category:

Other public institution

Category: [Other]

Your reply:

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Survey response 223

Response ID

6646

Date submitted

2018-09-26 16:39:13

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

Clear formal rules and the necessary resources to follow these rules would be a good start. Multilingualism and the equal rights of all languages is one of the pillars of the EU, but no one knows what we mean by it, nor are all Member States equally eager to fight for their language (nor to pay the costs for language services).

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

Yes, each institution should have a defined language policy. These should be published on the respective websites. They should be detailed enough to be binding (i.e. citizens should be able to count on finding versions in their language down to a clearly specified level. However, restricted cases can never be completely covered. A caveat saying that in some specific cases, the language choice may be restricted, and then an explanatory note for these specific cases should be enough

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

A policy would be useful in any case, as it would provide clarity. Member States and the institutions would need to agree on a reasonable framework, and on who will bear the costs/provide the resources/make the translation.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

5. Would it be helpful to have summaries of key issues published in all or many official languages?

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
--

Yes, this is a good solution.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

I think new and updated legislation is needed, not least in view of the new technical environment (Automatic translation/Machine translation). Institutions and Member states need to decide what kind of documents they want in all languages, and at what stage in the process of creation of each document it is needed in all languages (considering the present down-sizing of EU staff, a lot of documents currently being translated into all languages could probably be excluded from this obligation). Legislation should make a clear link between the obligation to provide certain documents in all languages and the resources necessary for this.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Documents needed in all languages should be covered by the EU budget, preferably under administrative costs. However, Member States need to be aware of the importance of this budget post and not treat it as something that can be cut at will, while still demanding the same service level. Individual Member States could be asked to pay for any particular, extra needs they might have.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation is getting more and more accurate, and many document types of a recurrent, standardised nature, could probably be written in a way (writing for machine translation) that made them easy to machine translate with a sufficient degree of accuracy for the purpose they serve. The actual translation services in the institutions could then concentrate their efforts on legislation and text with a rhetorical dimension which would tax machine translation too highly. This would eliminate a large part of the current workflow in the translation services and at the same time speed up the distribution of many "disposable" documents (documents only needed for a certain occasion, for information purposes), as they could be run through the machine and used straight away. But an upstream approach to the production of documents, differentiating between "for machine translation", possibly "for machine translation with post-editing" and "for in-depth translation" would be essential.

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Contact Information

Title, Name, Surname:

Dr Andreas Larsson

Organisation:

European Commission, DG Translation

Country of residence:

Belgium

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

de - Deutsch

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 233

Response ID
6707
Date submitted
2018-09-27 09:05:04

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Some EU institutions and Agencies should be reminded that the Founding Fathers of Europe clearly wished that EU citizens should be able to receive information about EU legislation in their national languages (Article 1). The increasing tendency for some institutions to narrow down the scope of multilingualism to EU legislation only means that many activity reports and crucial information is not available in the citizens' languages. This leads to a democratic deficit and it is clear that the European press tends to better cover EU activities when the information is provided to the journalists in their languages and not exclusively in English.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

EU Institutions and agencies should publish their language policy on their web sites. In particular, they should not be allowed to adopt a monolingual, English-only policy, as is sometimes the case for some Agencies. A report commissioned by the 'Francophonie' organization of French-speaking countries clearly shows that some Agencies like Europol, ACER, EIOPA, etc. etc. produce very interesting reports and have very informative web sites which are only accessible in English and which are therefore useless and incomprehensible to EU citizens who do not master the English language.

http://apf.francophonie.org/IMG/pdf/2014_rapportaffoi_sites_web_2013.pdf

The discrepancy between the way agencies implement their multilingualism leads to important confusion among EU citizens. Why is it that an Agency such as the European Monitoring Centre for Drugs and Drug addictions (EMCDDA) publishes its annual Drugs Report in all official languages (and even in some non-EU languages such as Turkish), which explains why the publication of this report traditionally receives widespread and excellent coverage in the European media, while other reports such as Europol's reports on jihadism in Europe for instance, receive a lot less coverage because they are available in English only. See the article in Le Monde Diplomatique: "Dans des domaines aussi variés que l'Autorité bancaire (ABE), l'Agence de coopération des régulateurs d'énergie (ACER) ou l'Agence européenne de défense (AED), la connaissance de l'anglais est nécessaire pour s'informer. Les rapports réguliers sur la menace islamiste en Europe par exemple ne sont publiés par Europol qu'en anglais." (<http://dominique-hoppe.blog.lemonde.fr/2015/06/02/le-cout-du-monolinguisme/>)

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

Yes, they should have a policy and it should be realized that monolingualism also has a cost (see the article in Le Monde Diplomatique: <http://dominique-hoppe.blog.lemonde.fr/2015/06/02/le-cout-du-monolinguisme/>)

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The static parts of web site should ideally always be available in all EU languages. The more dynamic parts (news items which regularly undergo frequent updates) could be limited to a smaller set of working languages. Such working languages should be based upon the statistics about foreign language learning (which shows that the top foreign languages learned by EU citizens are English, French, German, Spanish and Italian)

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Yes, at least summaries should be provided in all EU languages. In many cases, journalists write their articles using such summaries and the availability of these summaries in the citizens' languages would increase the chance of having them used/exploited by journalists to cover EU affairs.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

It seems that some countries have a population which, de facto, systematically knows and speaks one of the most widely-spoken languages: this is the case of Malta and Ireland, which are bilingual countries. The level of linguistic knowledge of English in these countries and the difficulty in recruiting skilled translators in sufficient numbers for languages such as Maltese and Irish might mean that such languages could probably both benefit from a derogation (as is currently the case for Irish, even if there are discussions around putting an end to the so-called 'Irish derogation'. Instead of ending this derogation, one could envisage extending it indefinitely and applying it to Malta as well because experience shows that very few people actually read translations into Maltese and into Irish because the English text is usually sufficient.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

The Annual Work Programme, but also the Annual Activity Reports, should be published in all languages for all institutions, but also for all Agencies. The visibility of the work of all these organisations would be enhanced (many people are not aware of the ecosystem of EU Agencies, which suffer from a deficit of visibility in many member states. Providing such reports in all languages and not just in English would contribute to bringing them closer to the EU citizens.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The original principle from 1958 should stay the same because reducing the number of languages is impossible for political reasons. However, the budgets should be available to allow the institutions and agencies to implement these crucial policies. It is not possible and desirable to aim at a monolingual situation like the United States, but the budgets should follow to make sure that multilingualism is seen as an investment, not just as a cost, and as a pillar of democracy.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Funding should definitely be provided to make sure that multilingualism remains a pillar of EU democracy. Citizens have a right to read legislation in their language. This is not just for legislation and activity reports from EU institutions and agencies should also be available in languages other than just English (and more than English, French and German). Funding could be provided by the Member States who wish their language to be preserved as an official language and it is certainly desirable to keep the current system of official languages; otherwise, understandable frustration about the hegemony of some languages (and Member States) would be created if the number of official languages was reduced. It is also the duty for Europe to preserve and defend its linguistic diversity, in the same way that it is its duty to preserve and defend its cultural diversity.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Despite the real and undeniable advances in machine translation, it should be realized that official documents (which are not just legislative acts) should be made available to citizens with a good quality. For working documents to be used internally, it may be acceptable to work with "machine translations" which are not always accurate, so there is probably a case for the use of machine translation, but not for unedited brochures, activity reports, work programmes, etc. So it is important to make use of the advances in machine translation while realizing that machine translations will always need to be post-edited by human translators to reach a sufficient level of quality.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Luxembourg

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

fr - français

Category:

Other public institution

Category: [Other]

Your reply:

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Survey response 240

Response ID
6769
Date submitted
2018-09-27 18:11:49

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? Roles of national bodies that interact with EU authorities. Technical nature of the EU body's activities (e.g. scientific)
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? EU institution should have a unified language policy. EU agencies should have some flexibility unless a common budget is available.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? Yes, it should. I am not qualified to explain how.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? 'About' sections of website, which tend to be more static could be translated. Specialist information could be made more limited depending on the type of users seeking it.
5. Would it be helpful to have summaries of key issues published in all or many official languages? Yes
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? Yes, it is acceptable. Ideally, a system could be devised to indicate most affected populations, for example, issues in certain geographical regions could have more tailored translations.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? Yes to both questions.
--

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

New legislation would be helpful, but it should be proportionate.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Funds could be derived from individual Member States, but this should also be calibrated to ensure greater balance between countries of different sizes. For example, few EU citizens use Estonian as a first language than German, but it would be punitive to distribute the costs evenly given the resources in different countries.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Translation memory tools work well and are reasonably reliable. Any machine-translated documentation should be clearly labelled as such and there should be references made to the original documents.

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Contact Information

Title, Name, Surname:

[REDACTED]

Organisation:

[REDACTED]

Country of residence:

Italy

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

it - italiano

Category:

EU institution

Category: [Other]

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Survey response 244

Response ID
6801
Date submitted
2018-09-28 08:59:50

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Indeed there is no comprehensive set of rules setting out language use by EU bodies. The institutions could work on adapting the existing legislative framework to the present day needs of a modern administration. Some common overall criteria would make the situation more consistent.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

The needs vary depending on the EU body. For example, the agencies deal with a very different audience and this speaks for a different regime.

For communicating to the general public via its website, ECHA strives, within its resource constraints, to provide the most relevant information to the public in all official EU languages.

The visitors of ECHA website may select their preferred official EU language, in which the content of the website will be displayed, if available.

When choosing which documents and information to make publically available on its website in all official EU languages ECHA prioritizes documents with:

- information on how the relevant actors may comply with their legal obligation under the relevant EU regulatory frameworks (REACH, Biocides and PIC); this includes a large number of guidance documents and especially information relevant for SME's;
- basic information on the Agency, its organisation and its operation.

ECHA strives to improve transparency with regard to its practice on use of languages on its website by making this information available under <https://echa.europa.eu/about-us/the-way-we-work/multilingual-practice>.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

ECHA accepts in exceptional cases to provide an unofficial translation of a document.

A more general right to a translation of individual documents on request could become very resource intensive. It could also result in a significant increase in costs, as well as the risk of not meeting the strict regulatory deadlines.

ECHA believes that it is necessary to allow for a margin of maneuver for each EU body in determining when and how to provide for individual translations. Each body may then decide to what extent the benefits of providing individual translations are proportionate to the costs and can be considered as a pertinent use of its resources.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

With regard to what parts of the EU bodies websites should be made available in all the official EU languages, ECHA refers to its reply to question 3. ECHA believes that priority should be given to parts providing information on the organisation and functioning of the EU body and guidance or information provided to the general public on how to comply with their obligations under EU law.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

This seems to be a practical way forward in cases where it brings added value. ECHA is currently examining to what extent providing summaries in all EU official languages in matters such as expert consultations can be helpful. The usefulness of such summaries may depend on the issue and the target audience.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

There are instances, where use of a restricted number of languages may be warranted. As an example, ECHA considers this to be the case with regard to expert scientific consultations. These consultations are not aimed at the general public but at specific stakeholders with relevant scientific and technical knowledge in a given field. If the dominant majority of such stakeholders operate mainly in one or very few languages, having consultations only in those languages should be sufficient to ensure that these stakeholders have an opportunity to contribute. At the same time it ensures that the relevant information is received by the body initiating the consultation.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

ECHA is aware that the European Commission on 28 April 2017 adopted, a new language policy on public consultations. However, this policy concerns only a very limited amount of documents published by the Commission and other EU bodies.

ECHA does not believe that adoption of the policy as a whole by other EU bodies would be pertinent to their needs, especially the requirement to use the three languages mentioned. The public consultations of the Commission are of a different nature and have a different target audience than for example consultations run by ECHA (or other scientific and technical agencies). Nevertheless, ECHA is analyzing and reflecting to what extent the principles of the policy can be used by ECHA in its regulatory practice.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The existing rules on language use set out in Regulation No 1/58 were agreed at a time, when EU had a limited number of official languages (German, French, Italian, Dutch). At the same time, the number of published documents was only a fraction of the documents which it publishes at present. The situation has fundamentally changed and there is a need for practical solutions to be agreed at the EU level.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

ECHA believes that the source and the allocation of appropriate resources is a matter to be solved by the Council and the EU Parliament.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

ECHA supports machine translation as a potential way forward. To that end ECHA has made a terminology database available on a website providing the translations of the common chemical terminology into all EU official languages (<https://echa-term.echa.europa.eu/>). ECHA is also at the moment examining together with the European Commission how this database of terminology could be best used in the Commission's machine translation projects.

Unfortunately, at this time ECHA does not believe that the technology behind machine translation is robust enough to provide for translations which could be considered equivalent to the original documents. For some of the language pairs, machine translation provides documents that are so difficult to understand that using them bears the risk of alienating citizens further from the EU.

However, using machine translation to make the work of human translators faster and easier may make their work more efficient. This may allow EU bodies to increase the number of translated documents with the same resources.

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Contact Information

Title, Name, Surname:

Head of Legal Affairs Unit, Minna Heikkilä

Organisation:

European Chemicals Agency (ECHA)

Country of residence:

Finland

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

en - English

Category:

EU institution

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 251

Response ID
6839
Date submitted
2018-09-28 16:21:10

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
The sections containing general information should be translated in all the official languages, whereas technical contributions that in real life are likely to be discussed only in English may as well be provided in English only. This being said, the flexibility referred to in Question 2 should allow that a written contribution that is particularly relevant to a country be made available in the official language of that country as well. To do so, again, a case-by-case assessment (see Question 1) would be needed.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
It seems a good idea, as many readers do not need to delve into the technical terms of a given topic, but may nonetheless want to have some clues about the key aspects of it. In the summary, reference to further reading (in English or other official languages) should be provided, for those who may want to go deeper into the topic.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
It is a hard question to answer, as criteria such as population size or level of linguistic diversity in the population imply a certain degree of exclusion, which should be well justified to be accepted. The relevance criterion mentioned in the answer to Question 1 could be an alternative, as it would be based on an assessment that takes into account more nuanced aspects, with the aim of ensuring a balanced and fair linguistic service.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

The policy described above seems rather balanced. However, one might argue that the “traditional” set of languages – namely English, French and German – chosen for the publication of a number of public documents may pose a problem in terms of linguistic diversity. The reason for such choice should always be clear (Size of the country? Number of EU citizens speaking these languages as a second language? Most common foreign languages studied in EU schools? Relevance in terms of GDP, or other measures?), as it is apparent that other second languages (e.g. Spanish) have been playing a more and more prominent role for some time now and could possibly be a further option for official communications. On top of this, the criteria adopted when choosing the additional languages to be used when translating public consultations of “broad public interest” should be clarified. Does a relevance criterion apply? How is it defined?

Going beyond these possible sources of criticism, the policy described above seems reasonable overall and could suit the needs of other EU institutions as well.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

From an external viewpoint it is difficult to say if a legal framework is needed or if a less binding document (e.g. guidelines) would suffice. For sure, a new set of rules and/or recommendations would be needed, as the institutional framework – as well as the world outside – has much changed since 1958.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

A detailed cost analysis should be made, also taking into account the savings that may arise from a more extensive use of machine translation engines. As everybody knows, more often than not the quality of machine-translated texts is not satisfactory but, provided that an effective post-editing service is put in place, an acceptable compromise could be achieved, at least for texts that are not considered crucial. As a result, the increase in volume could prove less costly than expected, but then again, an assessment of what an “important” text is should be made beforehand, as well as an evaluation of what an “acceptable” translation is. As to the funding, with no specific knowledge of the EU budget it is virtually impossible to make reasonable suggestions about the possible sources.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that “machine” translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

About machine translation: if the quality is really bad, it is pointless to have made the effort at all, as the reader instinctively questions the authority of the text and of what/who is behind the text and, not being sure s/he understands correctly (as the text itself leaves room for inaccuracies and misunderstandings), will probably need to look for some other content that appears more reliable. There is a material risk that the whole endeavor, instead of enhancing dissemination and linguistic diversity, ends up being counterproductive. At the same time, EU institutions cannot spend a huge amount of time and money on the multiple and accurate translation of documents that are not particularly important. As pointed out above, it is very difficult to find a one-fits-all solution. Bottom line is: machine translation should be used as it does speed up the translation process, but a minimum quality level should be reached before any content is made publicly available.

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:
Italy

Language of the contribution:
en - English

Other language in which you would agree to receive communications:
fr - français

Category:
Individual citizen

Category: [Other]

Your reply:
can be published in an anonymous way

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Survey response 252

Response ID

6840

Date submitted

2018-09-28 16:33:36

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

First, before deciding which language(s) should be used in a particular context the relevance of the content to be published should be assessed. A number of topics can indeed be more sensitive for some countries, and virtually unimportant for others. Although such an assessment is perhaps hard to make, and does not represent a definite and clear criterion, such evaluation would prevent the administration from translating too much with no added value. Second, a procedure by which any single country can express its interest in having a specific section of a website and/or a particular type of document available in its national language could be implemented.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

It would certainly be useful if each EU institution had its own language policy, and such policy should be made official and published. However, an extremely detailed and binding language policy would leave little room for case-by-case assessments, which should be allowed, as they reflect the flexibility that is needed when dealing with complex and evolving EU policy matters.
--

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

If an institution is ready to provide translations on request, the relevant procedure should be detailed in the language policy. Unlike in the answer in Question 2, in this case more stringent criteria should be established, as leaving too much flexibility could result in an unmanageable amount of requests and, supposing all such requests were satisfied, in very high costs for the administration.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The sections containing general information should be translated in all the official languages, whereas technical contributions that in real life are likely to be discussed only in English may as well be provided in English only. This being said, the flexibility referred to in Question 2 should allow that a written contribution that is particularly relevant to a country be made available in the official language of that country as well. To do so, again, a case-by-case assessment (see Question 1) would be needed.

5. Would it be helpful to have summaries of key issues published in all or many official languages?

It seems a good idea, as many readers do not need to delve into the technical terms of a given topic, but may nonetheless want to have some clues about the key aspects of it. In the summary, reference to further reading (in English or other official languages) should be provided, for those who may want to go deeper into the topic.
--

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

It is a hard question to answer, as criteria such as population size or level of linguistic diversity in the population imply a certain degree of exclusion, which should be well justified to be accepted. The relevance criterion mentioned in the answer to Question 1 could be an alternative, as it would be based on an assessment that takes into account more nuanced aspects, with the aim of ensuring a balanced and fair linguistic service.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

The policy described above seems rather balanced. However, one might argue that the “traditional” set of languages – namely English, French and German – chosen for the publication of a number of public documents may pose a problem in terms of linguistic diversity. The reason for such choice should always be clear (Size of the country? Number of EU citizens speaking these languages as a second language? Most common foreign languages studied in EU schools? Relevance in terms of GDP, or other measures?), as it is apparent that other second languages (e.g. Spanish) have been playing a more and more prominent role for some time now and could possibly be a further option for official communications. On top of this, the criteria adopted when choosing the additional languages to be used when translating public consultations of “broad public interest” should be clarified. Does a relevance criterion apply? How is it defined?

Going beyond these possible sources of criticism, the policy described above seems reasonable overall and could suit the needs of other EU institutions as well.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

From an external viewpoint it is difficult to say if a legal framework is needed or if a less binding document (e.g. guidelines) would suffice. For sure, a new set of rules and/or recommendations would be needed, as the institutional framework – as well as the world outside – has much changed since 1958.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

A detailed cost analysis should be made, also taking into account the savings that may arise from a more extensive use of machine translation engines. As everybody knows, more often than not the quality of machine-translated texts is not satisfactory but, provided that an effective post-editing service is put in place, an acceptable compromise could be achieved, at least for texts that are not considered crucial. As a result, the increase in volume could prove less costly than expected, but then again, an assessment of what an “important” text is should be made beforehand, as well as an evaluation of what an “acceptable” translation is. As to the funding, with no specific knowledge of the EU budget it is virtually impossible to make reasonable suggestions about the possible sources.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that “machine” translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

About machine translation: if the quality is really bad, it is pointless to have made the effort at all, as the reader instinctively questions the authority of the text and of what/who is behind the text and, not being sure s/he understands correctly (as the text itself leaves room for inaccuracies and misunderstandings), will probably need to look for some other content that appears more reliable. There is a material risk that the whole endeavor, instead of enhancing dissemination and linguistic diversity, ends up being counterproductive. At the same time, EU institutions cannot spend a huge amount of time and money on the multiple and accurate translation of documents that are not particularly important. As pointed out above, it is very difficult to find a one-fits-all solution. Bottom line is: machine translation should be used as it does speed up the translation process, but a minimum quality level should be reached before any content is made publicly available.

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1

Contact Information

Title, Name, Surname:
[REDACTED]

Organisation:

Country of residence:
Italy

Language of the contribution:
en - English

Other language in which you would agree to receive communications:
fr - français

Category:
Individual citizen

Category: [Other]

Your reply:
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Survey response 257

Response ID

6850

Date submitted

2018-09-28 17:13:43

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
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Dear European Union,

As a Catalan speaker with an eye on linguistic rights, my main language-related concern -not addressed in your questions- is of course: Why is Catalan not an official language of the EU? Catalan has more speakers (around 10 million) than about half the official languages (specifically Bulgarian, Croatian, Danish, Estonian, Finnish, Irish, Latvian, Lithuanian, Maltese, Slovak, Slovene and maybe Swedish). The rationale for this anomaly is as clear as day: We don't have our own state (now you know another reason why we want it), and Spain -allergic to its own cultural diversity- has done everything in its power (which of course is a lot) to prevent Catalan officiality. Linguistic rights are human rights. Equal rights for everybody.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

5. Would it be helpful to have summaries of key issues published in all or many official languages?

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
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IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Language of the contribution:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 265

Response ID
6870
Date submitted
2018-09-28 23:05:48

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
The amount of speakers of a certain language should be considered as criterion: a language with more than 5 million speakers, for instance, should become official.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
The language policy document should be elaborated by linguists and lawyers, and voted by the corresponding representatives. Moreover, it should be published and downloadable.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
The policy needs to be simplified and transparent. Moreover, there should be a consultation service run by young European law experts.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
All the information needs to be translated into all languages. That's for the right of information and for the sake of transparency.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
Same as in 4. Summaries need to be translated into all official languages.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
As stated before, population size of those speaking the language in question is a must. 5 million, for instance, should be represented.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
As previously stated, the citizens have the right to be informed in their mother language, provided this is spoken by several million. Summaries are appropriate and a consultation service could be available as chat or hotline.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The language legislation needs to be reviewed by a team of experts, that is linguists, lawyers and politicians.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

The EU has a team of professional translators who take care of the texts. More translators or those for new official languages need to be hired by means of employment offers.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation should not be accepted in EU matters. Professional translators should be hired instead.

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Contact Information

Title, Name, Surname:

Miriam Perez Mariano

Organisation:

Country of residence:

Germany

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

de - Deutsch

Category:

Individual citizen

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 268

Response ID

6875

Date submitted

2018-09-29 10:23:39

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
--

The European Union includes millions of people from 27 different countries. In some places, there is a great deal of discontent about the EU. There is also an information deficit - many people do not understand the EU, its institutions and how they operate. In this context, it is essential that information be made available in as many languages as possible. Yes, it does cost money to translate information but it essential that informations be made available in as many languages as possible.

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
--

I find this question very unclear - there are language policies e.g. the European Parliament. The work of DG Translation is very clear, as is that of SCIC. So is that of the European Central Bank. There are language policies out there. I don't understand why this question seems to favour restriction of choice.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

Again, this question is very skewed.

Maybe the Office of the Ombudsman should have spent some money on creating a questionnaire that is balanced and objective and that is trialled to establish if it actually works.

The EU has figures that show that the cost of translation per EU citizen is tiny. The benefits of translation, by contrast, are huge. The EU has to be inclusive and to do that it has to translate.
--

In the context of Brexit, translation may well be even more important in the future as there may be a shift to greater use of German or French.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

5. Would it be helpful to have summaries of key issues published in all or many official languages?

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

What policy does this question refer to? It mentions three approaches.

EU citizens should not be excluded from information that affects them.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The principles probably still stand. I'd need to see the content of the 1958 legislation to be able to answer this question. There are pros and cons to additional legislation. Perhaps the Ombudsman's Office could take legal advice on this?

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Again, this question is in a vacuum. How much does translation cost at present? What percentage of the EU budget is it? Of course there are concerns about the EU budget in the context of Brexit, but it is essential to keep EU citizens on board and not to appear to be secretive.

The costs of translation can be reduced by the use of technology such as translation memory (can help increase output) and by the use of post-edited machine translation. DGT Translation is well aware of these developments.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation varies considerably according to language combination. For it to be usable, it needs to be post-edited by human translators.

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Contact Information

Title, Name, Surname:

[REDACTED]

Organisation:

[REDACTED]

Country of residence:

Ireland

Language of the contribution:

en - English

Category:

NGO or association

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 271

Response ID
6883
Date submitted
2018-09-29 23:03:32

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
The sole criterium should be never, under any circumstances, to discriminate. That means never to give to one citizen in her mother tongue that which is denied to any other citizen of the EU. What is available in English should also be available in French, Hungarian, Polish, Estonia, etc. Anything else is discrimination, and the EU pledges itself to be non-discriminatory. It is not enough to state this - the EU should show it is completely non-discriminatory by its actions.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
Yes. A very simple language policy: no discrimination ever. It should be published on the institutions' websites, and it should be short and clear. Everything available in all 24 official EU languages, thus treating all EU citizens equally and conferring privileges on nobody. If this is considered too expensive I believe the EU institutions are obliged to consider other non-discriminatory solutions, such as the use of a neutral, pan-European language like Esperanto. There should be zero tolerance for discrimination, as such discrimination is dangerous and has the potential to tear the EU apart if a substantial number of citizens feel they are discriminated against.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
The only way to avoid disproportionate costs is to consider the use of a neutral pan-European language, such as Esperanto. Costs should never, ever, be an excuse for discrimination, for granting some citizens privileges, due to the random event that they were born in one country and not in another. Estonians, Poles and Hungarians must feel the EU sees them as being as valuable as English-speakers or French-speakers. If they feel discriminated against, as at present, they may vote for extremist, Euro-sceptic parties, as has happened in Hungary and Poland.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
Use of all 24 official EU languages, all the time. A clear and simple rule.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
Yes. Summaries in all 24 languages, all the time.
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
It is never acceptable to provide material in a small number of languages, and still less so to provide it in one official language only. That is discriminatory, and should always be avoided, irrespective of the cost. If the cost is too high, other non-discriminatory approaches must be considered. EU officials are well-paid, and should be able to come up with imaginative solutions, which are completely non-discriminatory.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

Public consultations should always be available in all 24 official EU languages. Anything else is not a public consultation, it is a consultation of a select section of EU citizens, excluding all who happen not to speak the languages chosen. That is unacceptable in a democracy.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

New legislation would be helpful. It needs to outlaw all linguistic discrimination at all times. No exceptions.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Publishing in all EU languages is the price of democracy, of including all EU citizens irrespective of language. If any group is excluded it is no longer democratic. Either use all 24 EU official languages always, irrespective of cost, or promote the use of a neutral, pan-European language such as Esperanto.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

No. Technology can be helpful in producing first versions of documents, but they should always be checked by a qualified human translator before being published. Otherwise we are discriminating against the speakers of most languages, and in favour of the lucky few who happen to be native speakers of the language of the original document. This should never happen.

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Contact Information

Title, Name, Surname:

Ms Nathalie Vernick

Organisation:

Country of residence:

France

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

fr - français

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 275

Response ID

6897

Date submitted

2018-09-30 16:14:35

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
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2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
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3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

Large citizen interest websites in all EU languages.
--

5. Would it be helpful to have summaries of key issues published in all or many official languages?

Very helpful.

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

Yes. Population size of those speaking the language in question.
--

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
--

Those rules are right balanced. EU must support MS in order to supply additional national translation system.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

New legislation is necessary. English language as unique functional language for UE institution working could be a solution.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

UE budget for English and all EU languages. For less language (FR, DE) additional funding from the MS involved.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Large use of translation technology is good. Hi performance machine translators developed or financed by EU have to be use instead of free/chep ones. In this domain I think in the near future the "machines" (software and hardware) could become better translators than humans (if they are nor allready)

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

România

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

ro - româna

Category:

Individual citizen

Category: [Other]

Your reply:

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Survey response 277

Response ID
6899
Date submitted
2018-09-30 17:31:43

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>In line with existing legislation, RTS and ITS proposals forwarded by EU agencies / specialised authorities to the Commission should always be translated in all official EU languages so that citizens can scrutinise the work of these EU agencies / specialised authorities.</p> <p>My detailed argumentation has been sent by email [September 30, 2018 05:25:54] due to space constraints hereby.</p> <p>Sincerely your,</p> <p>Yiorgos Vassalos</p> <p>Phd candidate on EU financial regulation, University of Strasbourg</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p>

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p>
<p>6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?</p>

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

en - English

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 279

Response ID
6903
Date submitted
2018-09-30 17:53:25

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply? All information to the general EU public should be translated in all official languages, no exceptions.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted? If an institution does not use all languages in the same way, then it should explain in a public language policy why and how the language usage is restricted.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs? All requests from the public should be translated to the official language she or he requested. Those costs are the costs of democracy. The cost of democracy is never too high.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages? All public information in all official languages. Simple.
5. Would it be helpful to have summaries of key issues published in all or many official languages? Yes, but in all official languages only
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)? Making the information public in all languages is not a cost. It is a benefit for the EU and for democracy

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions? No, as explained before

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

A detailed legal framework is always the best way

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

From the budget of the EU. These are the costs of democracy

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

To the maximum extent possible.

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Contact Information

Title, Name, Surname:

Organisation:

Private citizen

Country of residence:

Luxembourg

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

pt - português

Category:

Individual citizen

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 289

Response ID
6916
Date submitted
2018-09-30 20:11:32

I. Rules and practices on language restrictions

<p>1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?</p> <p>A clear language policy should be established and published on organisations' websites. At least the general-information sections "About..." should be published in all EU languages. Additional criterion: the language of the host country should always be covered.</p>
<p>2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?</p> <p>A clear language policy should always be established and published on an organisation's website. It should specify which sections of a website are translated and which ones are not, and why. The choice to exclude (or include) specific languages should be included (.e.g budgetary constraints; English as the lingua franca of science).</p>
<p>3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?</p> <p>By all means. To avoid excessive costs, rough machine translations - to be revised internally - could be offered. In some cases it may be appropriate to offer translations upon request in exchange for a fee.</p>

II. EU websites

<p>4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?</p> <p>At least the general info sections "About...", "What we do", the name of the Institution/body in all EU languages and a general-information flyer should be available in all EU languages. Regular updates to the language versions should be planned from the start, hence the importance of language technologies such as CAT tools and translation memories.</p>
<p>5. Would it be helpful to have summaries of key issues published in all or many official languages?</p> <p>Yes, by all means.</p>
<p>6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?</p> <p>If there are budgetary constraints, it is better to make material available in the major EU languages (EN, DE, FR, ES) rather than in all of them. One of the criteria could be the outcome of web analytics performed on the number of visits to a website.</p>

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

Regarding "All other public consultations need to be made available at least in English, French and German", consideration might also be given to including Spanish, given that it is one of the most spoken languages in the world.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

Not necessarily. Common guidelines adopted by the European Institutions and Agencies, or recommendations from the European Ombudsman may also serve the purpose. Ideally any such initiative would be informed by a public consultation (published in all EU languages!).

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Most of the translations produced by EU Institutions and Agencies are performed by the Translation Centre in Luxembourg (CdT), which has very high translation rates to the point that it may happen that they have to return money to their clients at the end of the year. As a first step, the CdT might explore ways of reducing the rates they charge to EU Institutions and Agencies to bring them more in line with the private language translation sector.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Language technologies (CAT tools) should be used as much as possible and, where appropriate, translation memories should be exchanged or be open-source in order to re-use content, thus decreasing the cost of new translations.

Machine translation resources are becoming more and more accurate, especially with the arrival of neural machine translation (NMT). Translations produced by NMT can be invaluable to get the gist of a document or web page or to obtain a rough, quick translation of extensive documents.

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Contact Information

Title, Name, Surname:

Mr James RAMSAY, Head of Communication Unit, EFSA

Organisation:

European Food Safety Authority (EFSA)

Country of residence:

Italy

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

en - English

Category:

Other

Category: [Other]

EU agency

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 295

Response ID
6929
Date submitted
2018-09-30 21:10:53

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

Most of the questions in the survey are sub-questions. We consider it more appropriate to answer these questions individually.

a.
The default situation should be to provide as much information as is possible and necessary in each official language, especially so for public-facing content. The reality is, many citizens of the EU do not speak En, Fr or Ge to an extent that would allow them to fully participate in the EU project, despite what various studies would have us believe.
Language is a vital part of each MS's identity. Especially for languages of lesser diffusion, it is vital to maintain and promote use of those languages. Studies could be conducted on how those who speak such languages react to not being able to access info in their own language. A sense that the Union adds to, and is an additional layer on top of national culture, could be undermined if the no. of languages in which citizens can interact with is reduced.

Moreover, investment in language/translation generates multiple benefits and is as a multiplier in the economy (s. Linguanomics, Hogan-Brun)

"The language of Europe is the language of translation".

b.?

We have already suggested an in-depth study on the emotional impact of moving away from a complete commitment to multilingualism. It is our impression that abandoning multilingualism on a large scale would undermine support for the Union among its citizens.

The study could also be done on what information is necessary in which languages for which parts of society so that decisions can be more evidence-based. Cost cannot be the sole criterion in decision-making, e.g most cases from the CJEU don't have to be translated into all official languages.

c.?

Docs for external use translated into all langs.

For internal use, e.g. intercomprehension within language families could reduce admin costs, but such practices should not be extended to the public.

Criteria uniform across all EU bodies to promote sound admin and legal certainty for citizens

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

Yes, there should be a language policy. We would suggest one general language policy for all EU institutions and agencies with additional information (perhaps in the form of Annexes) relevant to the work/content of each institution/agency. It might save time and work involved in actually producing a policy because it would be done once and effort would not be replicated.

B.?

Any policy should ensure that citizens of the EU have the opportunity to be fully involved in the workings of the EU their own language. The importance of national languages and of translation, as essential to the European project, should be clearly stated. We shouldn't be paying lip service to linguistic diversity. The EU affects all areas of our citizens' lives and the approach to the provision of information in all languages should reflect this.

C.?

Should it be published on the website?
Yes, it should be published so that anyone who wishes to, can access it.

D.?

If there are restrictions on the number of languages, how detailed should the restrictions be?
If there are restrictions they should be realistic but pragmatic. Cost cannot be the sole, or main, factor. Language is too integral to the EU for that.

Any restrictions should be very detailed and clear reasons for the restrictions should be provided. It might be useful to perform a cost-benefit analysis in relation to any proposed restrictions. It would also be useful to provide clear examples to situations in which the restrictions apply and the justifications for them.

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

A. should there be a policy of making TR documents available on request?

If this would involve EU citizens paying to access information that should be available to them by right, then no, the institutions/agencies should not have a policy of providing documents on request.

b. how can one avoid disproportionate costs here?

How can the provision of information for EU citizens in their own language be discussed in connection with disproportionate costs?

Once again: the Language of Europe is the language of translation.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

5. Would it be helpful to have summaries of key issues published in all or many official languages?

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

As mentioned above, with “linguistic diversity” we are not speaking about some lofty ideal, but about humans whose lives are impacted, day for day by the EU, positively and negatively, and who need to have the necessary information available in their own language in order to be able to make informed decisions. It all comes back to who will decide what is of “broad public interest” and what not.

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The “language issue” is fundamental to the success of the European project and should be dealt with within a legal framework to reflect the current reality.

Having a language policy in legislation would send a strong signal about the importance attached to language and the EU project.

If the language issue is not regulated in law, it would be easier to introduce changes based, for example, on administrative or financial criteria, which may not be beneficial for the language regime.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

A. How could the costs be met?

By reducing costs in other areas:

- Get rid of the nonsense that is the monthly move to Strasbourg;
- Why not introduce remote parliamentary / committee meetings?
- Get rid of business-class flights for MEPs and all other EU staff within Europe. The furthest flight from Brussels is probably Bucharest – under three hours. Quite doable in economy class and it would save millions every year.
- Cut out the middleman (translation agencies) when sourcing external translators.
- Combine services and information in the various institutions, where possible
- Relocate the internal translation units from Brussels to the individual Member States. Apart from the cost reduction (less need for office space etc.), in-country translators are far more up to date with current language conventions. The danger of “Euro-speak” would be lessened.
- etc.

b. Should they be met from the EU budget?

Yes, by rationalising the budget along the lines suggested above, thereby making more money available for translation, which is an essential part of the European project.

c. Should it be done by getting Member States to contribute for their own language?

If Member States are not asked to increase their budgetary contributions for other vital areas (like environmental policy) then why would they be asked to pay more to have information translated into their own language. Reducing wastage in other areas, and improving efficiencies within the EU would free up substantial amounts which could be re-focused on more useful things like translation.

d. other model

no comment

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Machine translation (MT) is a tool that is very useful in some situations, however, it is a tool to be used by and generally not to replace translators – if the purpose of a translation exercise is actually to produce a coherent and cohesive document for the intended reader. We are far from a situation where MT can do all translation work.

The basic question here is “is lack of accuracy an acceptable price to pay for more translation simply because it is cheaper?”

The answer has to be no. Public-facing information is often intended to describe rights and obligations. You cannot get it wrong. You cannot get it “sort of” right.

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Contact Information

Title, Name, Surname:

Dr. Annette Schiller

Organisation:

FIT Europe, Regional Centre of the International Federation of Translators (FIT)

Country of residence:

Ireland

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

de - Deutsch

Category:

NGO or association

Category: [Other]

Your reply:

can be published with your personal information (personal email addresses are not published)

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Survey response 296

Response ID
6932
Date submitted
2018-09-30 20:56:31

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?

The Panhellenic Association of Translators (PEM) is Greece's oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

We also intend to follow up this request by telephone call to ensure that the message has been received.

Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?

The Panhellenic Association of Translators (PEM) is Greece's oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

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Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?

The Panhellenic Association of Translators (PEM) is Greece's oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

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Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?

The Panhellenic Association of Translators (PEM) is Greece's oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

We also intend to follow up this request by telephone call to ensure that the message has been received.

Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

5. Would it be helpful to have summaries of key issues published in all or many official languages?

The Panhellenic Association of Translators (PEM) is Greece's oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

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president
president@pem.gr

6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?

The Panhellenic Association of Translators (PEM) is Greece's oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

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president
president@pem.gr

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning “priority initiatives” in the Commission’s annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of “broad public interest” should be made available in additional languages. Furthermore, “consultation pages or a summary thereof need to be translated into all EU official languages”. Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?

The Panhellenic Association of Translators (PEM) is Greece’s oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

We also intend to follow up this request by telephone call to ensure that the message has been received.

Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

The Panhellenic Association of Translators (PEM) is Greece’s oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

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Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

The Panhellenic Association of Translators (PEM) is Greece’s oldest and largest association of professional translators and interpreters. We have composed a detailed set of inputs in response to your extremely important public consultation. However, having only found out about it in late September, we are sadly not in a position to submit tonight. We pledge to do so in the following few days, certainly not later than the end of the first week in October. Please take into account that we polled our members in order to compile our responses, thus we believe that they will be very valuable in your work and worth the few extra days.

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Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

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We also intend to follow up this request by telephone call to ensure that the message has been received.

Yours faithfully,
Fotis Fotopoulos
president
president@pem.gr

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Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Greece

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

el - ελληνικά

Category:

NGO or association

Category: [Other]

Your reply:

can be published in an anonymous way

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Survey response 306

Response ID
6946
Date submitted
2018-09-30 22:30:07

I. Rules and practices on language restrictions

1. There is a lack of transparency (and few formal rules) regarding how the different sections of the EU administration make information available in the different official languages of the EU. This includes, for instance, the criteria used in deciding which language(s) to use in particular contexts. How can these gaps be addressed? What additional criteria, if any, should apply?
Important political information should be published in all EU languages; calls and tenders in the "big languages", each country should translate the instructions into their language. Additional criteria: importance of information; legal information. As a general principle, the rules should be the same for all EU administration units.
2. Should each EU institution have a language policy and, if so, what should be included in a language policy? Should such language policies be published on the institutions' websites? How detailed should such a policy be regarding specific cases in which the choice of language(s) is restricted?
The EU institutions should follow the same language policy and they should be published on each institution's website.
3. Should each institution have a policy on the circumstances under which it may provide translations of information or of documents on request? If so, how can that policy be framed in order to avoid disproportionate costs?
Translation on request should be given in any case if the text is very special, difficult to understand. This is important in particular for 'minor languages'.

II. EU websites

4. What general language principles should apply to the websites of EU institutions? Which parts of EU websites, in particular, do you think should be available in all or many EU languages?
At least the general overview over the fields of activity of each institution should be made in all EU languages.
5. Would it be helpful to have summaries of key issues published in all or many official languages?
Definitely!
6. Is it acceptable in certain circumstances to provide material in a small number of languages, rather than in all the official languages? If so, what criteria should be used to determine how these languages are chosen (for example, population size of those speaking the language in question, level of linguistic diversity in the population ...)?
The decision which texts to translate into a limited number of languages could be too subjective.

III. Public consultations

7. In April 2017, the European Commission adopted new internal rules that require documents relating to public consultations concerning "priority initiatives" in the Commission's annual Work Programme to be published in all EU official languages. All other public consultations need to be made available at least in English, French and German. Public consultations of "broad public interest" should be made available in additional languages. Furthermore, "consultation pages or a summary thereof need to be translated into all EU official languages". Does this policy, in your view, strike the right balance between the need to respect and support linguistic diversity, on the one hand, and administrative and budgetary constraints, on the other hand? Is this the type of policy which might reasonably be adopted by other EU institutions?
Yes

IV. Other

8. The only specific legislation on language use by the EU administration dates from 1958 when there were six Member States and four official languages. Do you think that, in the present circumstances, new legislation would be helpful? Or do you think that dealing with language issues is best done outside of a detailed legal framework?

A legal framework is difficult to change; therefore, general rules adopted by all Member States might be better.

9. Any increase in the volume of information and documents published in all EU languages will involve additional translation costs. How do you suggest that these additional costs be met? From elsewhere in the EU budget? By way of earmarked additional funding from the individual Member States involved? By some other means?

Automatic translation is getting better; it should be used wherever possible.

10. To what extent can technology be used to provide translations between the various EU languages? To the extent that "machine" translations may not always be fully accurate, is this an acceptable price to pay for having documents made available in translation more speedily and economically than would otherwise be the case?

Yes

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filecount - If you want to upload any further documentation, please use this field.

1

Contact Information

Title, Name, Surname:

Organisation:

Country of residence:

Germany

Language of the contribution:

en - English

Other language in which you would agree to receive communications:

de - Deutsch

Category:

NGO or association

Category: [Other]

Your reply:

can be published in an anonymous way

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