Filozofická fakulta Univerzity Palackého

The Role of Comments Files in Institutional Translation:
the Case of the ECB

(Diplomová práce)

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Role souborů s komentáři v procesu institucionálního překladu:

případová studie ECB

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(diplomová práce)

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Abstract

This thesis investigates the translation process in the European Central Bank by analysing the status and role of comments files. Comments files are defined as an accompanying document that is used by translators to communicate with other participants in the translation process, mainly to clarify issues surrounding the source text. A collection of comments files obtained from the ECB translation service was analysed with special regard to translation quality and translation norms. A categorisation was devised and applied to a sample of comments to identify potential for further research. The thesis also provides several practical suggestions for the use of comments files in the ECB translation service.

Key words: case study, comments files, institutional translation, paratext, ECB, the European Central Bank, the European Union, translation process

Anotace

Tato diplomová práce se zabývá překladatelským procesem v Evropské centrální bance, kde analyzuje postavení a funkci souborů s komentáři (comments files). Soubory s komentáři jsou definovány jako průvodní dokument, který překladatelé využívají ke komunikaci s ostatními účastníky překladatelského procesu, zejména k vyjasnění otázek ohledně zdrojového textu. V rámci výzkumu byla analyzována kolekce souborů s komentáři z prostředí ECB se zřetelem na kvalitu překladu (jako procesu i jako produktu) a překladatelské normy. Byla vypracována kategorizace komentářů, dle které byl následně anotován vzorek komentářů za účelem odhalit oblasti pro další výzkum. Práce rovněž předkládá několik praktických návrhů k využívání souborů s komentáři v překladatelském oddělení ECB.

Klíčová slova: případová studie, comments files, institucionální překlad, paratext, ECB, Evropská centrální banka, Evropská unie, překladatelský proces

LIST OF ABBREVIATIONS

EEC	European Economic Community
EU	European Union
EC	European Commission
ECA	European Court of Auditors
ECB	European Central Bank
EMU	Economic and Monetary Union
ESCB	European System of Central Banks
SSM	Single Supervisory Mechanism
NCB	National Central Bank
RoP	Rules of Procedure
DGT	Directorate-General for Translation
DGC	Directorate-General Communications
LGS	Language Services Division
MTE	Multilingual Translation and Editing
ETE	English Translation and Editing
DARWIN	Document and Records Web-based Interface
IATE	Interactive Terminology for Europe
QA	quality assurance
QC	quality control
CF	comments file
CAT	computer assisted translation
TS	Translation Studies
CDA	critical discourse analysis
SFL	Systemic Functional Linguistics
ST	source text
TT	target text
NP	noun phrase
PP	prepositional phrase

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1 INTRODUCTION

A considerable number of translations is produced in an institutional setting and the European Union might be the perfect example of modern institutional translation. It is also the most scrutinized subject of institutional translation research so far (Pym 2000; Wagner, Bech, and Martínez 2002; Koskinen 2008 and others). Besides being the largest translating institution in the world (Kang 2011, 144), the European Union also epitomizes current trends, such as globalization, digitization, and interconnectedness. These developments bring about pressures on increasing efficiency, growing demand, tightening of deadlines and other forces that favour work division and institutionalization of translation. Such trends may also have a negative impact on translation quality (Mossop 2006), which makes the EU translation environment of interest to both practitioners and researchers. In addition, institutionalization may be part of a natural, if not universal, development in translation. It is therefore pertinent to deepen the scientific research of this field so that the practice of translation can be informed with empirically supported theory.

The existing research has so far focused predominantly on sociological and cultural perspectives, such as studies expanding on the concept of agency (Koskinen 2010, Tcaciuc 2012, 2017) or delving into the EU culture and looking at the bigger picture (Pym 2000). However, as Koskinen proposes in her post-deconstructionist view, the value and potential of micro-level research should not be underestimated or overlooked for it can help us understand the subject in its entirety (Koskinen 2008, 7). In the same spirit, the overarching research paradigm of this thesis is the ethnographic approach that views translation as a "socially situated activity" (Flynn 2010, 116), acknowledging the complexity of the research subject in its wider context. At the same time, the thesis is intended as a micro-level study that will ideally contribute to a large-scale project.

The aim of the thesis is to provide insight into institutional translation in the context of the EU by focusing on the translation process in one of its institutions, the European Central Bank. More specifically, the focus is on the concept of a comments file. A comments file (CF) is a working name for a shared copy of a source text for translation, which is used as a medium for discussion between translation participants. During the translation process, the CF is used in the form of an MS Word document

and its intended function is to streamline, centralize and consequently facilitate discussion of the text being translated, which takes place mainly between individual translators and editors (personal correspondence 2020). Following the completion of a translation project, CFs are archived and eventually compiled into spreadsheets in MS Excel files to be used as a reference tool for future translations. It is hypothesised that CFs as such have an informational but also a normative function, acting as an *ad hoc* and dynamic guideline for translators.

The goal of the present thesis is to situate the CF into the translation process, investigate its role, and identify theoretical implications in relation to translation quality and norms. Under these two areas, other concepts are also be considered, such as the role of translation participants, multilingualism, and institutional voice.

1.1 Methodology

The research carried out in the present thesis was partially motivated by the author's six-month stint as a trainee translator at the European Central Bank. Owing to the opportunity to directly participate in the translation process, research data could be collected in its authentic form and supplemented with direct observation without the need to employ prefabricated questionnaires or other methods. Given these conditions, the research was designed as a case study.

The case study as a research approach has been covered extensively by scholars whose definitions vary (e.g. Stake 1995; Hendl 1997; Thomas 2011; Yin 2018). In this thesis, a case study was adopted because it is "open-ended and flexible in terms of research questions and design" (Saldanha and O'Brien 2014, 2011). For the same purpose, the thesis does not rigidly follow a single prescribed methodology, but is rather a combination of study types, which can be characterized by three main principles: it is *instrumental* in the sense that data were analysed with an *a priori* focus on a pre-theorized concept of CFs as a distinctive communicative channel in the translation process; it is also *exploratory* in its aim to clarify the role of CFs in the context of translation process and their relationship to other concepts related to quality control and translation norms; finally, this study attempts to be *prospective* by identifying suitable areas for further research and practical application. Comments files as a theoretical concept are thus treated as an object, a theoretical focus of the study, while the ECB as an institution constitutes the subject studied or the "case".

Despite having the benefit of an insider's view, collection of data was fundamentally restricted due to the institution's confidentiality and information protection rules. Contextual information is thus supplemented with the findings of other researchers, who usually have practical experience as in-house translators, either from other EU institutions (Wagner, Bech, and Martínez 2002; Svoboda 2013) or directly from the ECB (Tcaciuc 2012). This information was consulted with an ECB representative, as far as the working conditions allowed, to assure that the statements presented in the thesis are up to date.

Towards the end of the traineeship, the author had amassed a collection of CFs in both Word and Excel file forms pertaining to texts translated in 2019 or before. More recent files could not be used due to the confidentiality and information protection policy of the ECB. This documentation constitutes the raw data for a linguistic analysis and an analysis of discourse. The analyses were first carried out in a heuristic fashion, aiming to gain insight into the status and role of CFs in the translation process. Based on the findings, a categorization of comments was developed to reflect their key features with translation quality and norms as vantage points. This categorization was then applied to a smaller sample of comments to gain quantitative results for comparison of different features.

As a complementary source, the published translations of the texts discussed in the comments were analysed selectively. This analysis was used as a triangulation to the findings from CFs to investigate the relationship between the translation process (studied via CFs) and the translation product.

1.2   Rationale

As already mentioned above, understanding institutional translation as a whole requires "detailed case studies of different institutional contexts" (Koskinen 2010b, 59). In addition to that, there seems to be a divide between theory and practice in this area. Koskinen believes that while the establishment of Translation Studies as an independent discipline has been a success, the voice of TS is seldom heard (2010d). To remedy this situation, researchers should reach out from the academia. Under the term Public Translation Studies, Koskinen (2010b, 21) proposes a subdiscipline that would be in direct contact with different spheres of the public,

where knowledge is valued for its communicative function and legitimacy is achieved via relevance. Her idea is reflected in the goals of this thesis.

The output of this study should be a better understanding of the inner workings of the translation machinery at the ECB not only to inform theoretical conceptions of institutional translation but to identify areas for further research with a prospect of workflow and efficiency improvement. Comments files as a tool are adopted in other EU institutions as well (Svoboda 2013, 92) which means that subsequent case studies will have the potential for gaining more generally applicable – and therefore more valuable – insights.

As comments files represent a structured means of digitising the discussion that is integral to the translation process in an institution, the current pressures on transitioning to remote working put an ever-greater emphasis on optimization of their use and all related processes.

2   INSTITUTIONAL TRANSLATION

Institutional translation can be traced back to the 2nd century B.C. Greece and the translation of the Old Testament from Hebrew to Greek (Wagner et al. 2002, xiv); a translation known as the Septuagint. In Translation Studies (TS), however, it was not among the primary areas of interest. It was only in the 1980s in the so-called "cultural turn" (Snell-Hornby 2006, 3) that the German scholars drew attention to the communicative and functional approach to translation[1], among whom was Justa Holz-Mänttäri, who highlighted the cooperative element of the translation process (Holz-Mänttäri 1984). Even so, the lack of a compact view on institutional translation as part of TS was still present. In 1988, a Canadian translator Brian Mossop addressed this issue explicitly, calling institutional translation "a missing factor in translation theory" (Mossop 1988, 65).

In the following years, institutional translation has been studied quite extensively, mainly with the focus on the EU institutions. For example, Wagner, Bech, and Martínez (2002) provide a comprehensive insider view of the EU translation

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[1] Note that in the Czechoslovakian tradition the concept of an institution was addressed in translation theory as early as in 1975 in the work of Anton Popovič, albeit in the context of literary translation (Svoboda 2019, 13).

services and an overview of translation in the EU in general. Others specialise in legal translation (Biel 2019; Prieto-Ramos 2017; 2018) or give an account of a single institution (Koskinen 2008; Tcaciuc and Mackevic 2017). Outside the EU context, several studies have addressed for example translation agencies (Sosoni 2011; Risku 2004), governmental bodies (Mossop 1990), NGOs (Schäffner, Tcaciuc, and Tesseur 2014), or media agencies (Kang 2007; 2012).

The course of research is at times hampered by the problem of definition and conceptualization, specifically the widely differing understandings of the term *institution* and its application to translation (see Koskinen 2008, 15–35). Koskinen uses the term *institution* in the sense of "a form of uniform action governed by role expectations, norms, values and belief systems" (2008, 17). The significance of norms highlighted by this formulation is further discussed below. While Koskinen's definition of institution is rather broad, her concept of institutional translation is more specialised. The principal characteristic of her definition, also adopted in the present thesis, lies in the polysemy of the phrase "translating institutions". Such institutions are not merely translating but they are also *being translated* by themselves (Koskinen 2008, 3). As a result, both the author and the translator of a text are subsumed under a single entity.

Nonetheless, other scholars point out that a study of institutional translation cannot rely on a general institutional approach but needs an individualised framework that views the institution studied in its context (see Kang 2014 for a review). Norms are also significant in setting apart different categories of institutions. Translating institutions may communicate their norms, including their translation and language policies, implicitly or have them clearly formulated, which influences the translations they produce (Schäffner, Tcaciuc, and Tesseur 2014, 16). This differentiating factor is related to a broader view of institutional translation as *institutionalised*. In other words, the status of translation in each institution can be expressed as a degree of the process of institutionalisation (Koskinen 2014).

Considering individual aspects of institutional translation, extant research focuses on an array of topics ranging "from the politics of translation, power and ideology, and multilingualism to work modes, translator positioning and motivation, translation training, and textual shifts and mismatches" (Kang 2014, 3). The following sections outline the most discussed research questions that are of relevance to the present thesis.

2.1 Institutional Voice and Normativity

Under Koskinen's definition of institution,

> we are dealing with *institutional translation* in those cases when an official body (government agency, multinational organization or a private company, etc.; also an individual person acting in an official status) uses translation as a means of "speaking" to a particular audience. Thus, in institutional translation, the voice that is to be heard is that of the translating institution. (2008, 22)

This has implications for the authorship of the TT. On the outside, translations are presented under the name of a political entity as opposed to a human individual. Target readers thus have no way of knowing who stands behind the institutional voice they communicate with. Identifying an individual author is no less difficult from the inside because institutional texts are produced in cooperation between multiple contributors. The collective authorship results in anonymity of individual translators as well as in collective responsibility; this has been observed particularly in the context of EU institutions (Pym 2000, 7; Koskinen 2000, 60). In the ECB, translations are assigned according to the capacity of individual translators and division of some tasks is variable (see Section 3.4).

The exact status of translators as constitutive of the institutional voice is all but uncertain. A considerable amount of research has shown that translators do not perform a mere transfer of meaning but engage in a situated decision-making process that is influenced by their personal stance, ideology, and attitudes (Kang 2014, 2). Koskinen (2000, 61–62) raised concerns about translators' anonymity limiting their expertise and called for their higher involvement as cultural mediators. Subsequently, much attention has been paid to translators' agency, here defined as "willingness and ability to act" (Kinnunen and Koskinen 2010, 6). While the interest in agency and concerns about constraints imposed on translators' decisions sprung from translation in the EU environment, the concept of agency itself is much broader. In classical sociological theories, which lent concepts to sociological approaches to translation, an individual's agency is never completely unconstrained (Tyulenev 2016, 21). It may be argued then that there is nothing peculiar about institutional settings and translators' freedom can be equally limited in other social circumstances as well. Indeed, the results of studies looking into the institution's control over its translators are inconclusive (see for example Mason 2004; Kang 2012). Translators' agency and its limitations seem to be rather determined by more specific features of individual

institutions, such as work modes or organizational structures (Schäffner, Tcaciuc, and Tesseur 2014) as well as the translator's personal stance and motivation (Mossop 2014).

Accepting this assumption, the next logical step to investigate the constraints on translators' agency would be to identify and study individual influences, that is, the other agents. The present thesis will use to term *agent* to refer to any more or less abstract entity that affects either directly or indirectly the result of the translation process. It is thus a general category whose main purpose is to highlight the essence of the well-worn phrase "translation does not take place in a vacuum". Wagner, Bech, and Martínez (2002, 56) identify several agents that may impinge on the translator's discretion in the EU institutions, among whom there are revisers, experts, politicians, and officials as well as "the ghosts of translators past", that is, the precedent. In more specific terms, translators hardly ever start their job from scratch; therefore, they must consider the previous solutions of their colleagues, terminological conventions, and any intertextual implications. The commonplace representation of this agent would then be a suggestion from a translation memory. Drugan, Strandvik, and Vuorinen (2018, 51) identified up to 14 potential agents in the translation process only at the level of the DGT. Lastly, even the end-users of a translation have a substantial effect on the translation process through their impact on quality management (cf. Suojanen, Koskinen, and Tuominen 2015).

As illustrated by the examples above, agents in the translation process are linguists, but also people who might not be consciously aware of their influence. Moreover, inanimate objects (translation memories) or abstract concepts (norms, rules, beliefs) may be regarded as agents too. In this sense, institutional translation is closely related to the paradigm of Descriptive Translation Studies (DTS) that sees translation as a norm-governed activity (Toury 2012). A number of norms have been proposed by Toury (2012)[2] and Chesterman (1993). Even though these norms supposedly apply to all kinds of translation (Toury 2012, 81), it has become apparent that in institutional environments, particularly in the EU institutions, many recognized theoretical concepts from TS do not hold (see Section 2.3.3 below). However, many researchers agree that rules are an essential feature of institutional translation (Svoboda 2017, 76).

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[2] First published in 1995.

They are the link between individuals and the overarching framework of their institution (Nee 1998, 3).

A useful perspective is provided by Scott (2014) who talks about three constitutive pillars of institutions: regulative, normative, and cultural cognitive (2014, 55–86). These three pillars may be viewed as forming a continuum or in a hierarchy based on the degree to which certain behaviour is internalised or subconsciously taken for granted by members of an institution. The regulative pillar represents the most explicit and prescriptive forms of governing that institutions partake, since "all institutions constrain and regulate behaviour" (Koskinen 2008, 18). Such prescribed practices are supported by the normative pillar, which broadly corresponds to social roles. In enacting their social roles, members of an institution follow norms and values because they feel morally obligated to do so (Scott 2014, 60). Finally, the cultural cognitive pillar constitutes the internalised views of the world and ways of interpreting information (ibid.). These views and processes are shared within an institution and pass unquestioned by its members, or in other words, they are taken for granted.

Different researchers emphasize different pillars, resulting in multiple definitions of institution (Koskinen 2008, 17). Since the regulative pillar is explicitly formulated, it is the easiest one to study. Regardless of that, translating institutions arguably represent all three pillars in complementarity and the "deeper" two may resurface in either verbal or nonverbal behaviour. It is also important to bear in mind that rules of the regulative pillar are usually based on norms and values, which makes compliance easier (Koskinen 2008, 18). For the purpose of clarity, rules should be here understood as explicitly stated practices that are prescribed by the institution to its employees and may be more or less obligatory. This may include the practice of reviewing every translation that is required by the ISO 17100 standard and is also stated in the DGT's translation guidelines. Norms, on the other hand, are the tacitly required behaviour that is expected from each person based on their social role. For a translator, it is most probably expected that s/he will refrain from introducing substantial changes or projecting their own beliefs into the translation, or that s/he will not create unjustified borrowings/calques. These expectations, however, may change with time and even from one institution to another. A significant way in which norms may manifest themselves is in translation revision, or indirectly in previous translations. To achieve and maintain a standard of quality, institutional norms must

be understood and adopted by all translation agents (Drugan, Strandvik, and Vuorinen 2018, 60). To communicate institutional norms to all agents and thus harmonize the institutional voice with the voices of individuals, translating institutions apply rules in various forms and to different extents[3].

According to Mason, guidelines in institutional translation are either produced by the institution for the translators to follow or emerge from past problem-solving experience and sharing of practices between translators (Mason 2004, 470). This highlights the fact that the institutional voice cannot be strictly separated from the individuals since the institution *is* the individuals. In the same fashion, rules cannot be clearly distinguished from norms because they are in constant interaction.

The exercise of agency can be conceived of as a combination of horizontal and vertical processes. Vertical processes are the exercise of the institution's authority over its employees in the form of rules. Horizontal processes denote the individual's navigating of rules to find suitable applications in specific situations. An explicit illustration of horizontal processes is a discussion of solutions and strategies between translators. It is only in the horizontal processes that determine the final effect of rules. As Koskinen observes, "it is not norms that govern translation activity, but the translators' ways of dealing with these norms" (Koskinen 2010a, 178). The present thesis conjectures that comments files are a point of contact of the two types of processes and as such coordinate the institutional voice with other agents (see Section 6.3).

In connection to translation, the notion of rules is naturally related to the concept of quality. The following section discusses quality from the perspective of institutional translation, reviews some of the key concepts and outlines the quality framework of one of the most comprehensive translation services, the DGT of the European Commission.

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[3] Svoboda, for example, lists "established procedures, explicit principles, glossaries, guidance, (written and unwritten) guidelines, guides, guiding principles, institutional 'group mind', institutional doctrines, instructions, manuals, norms, official guidance on (translation) policy, organized procedures, style guides, terminology requirements, translator's handbooks, algorithms (e.g., automatic TM analysis, pre-translation), codes of practice, (EU) culture, customs, etc." (Svoboda 2017, 77).

2.2 Institutional Translation and Quality

The concept of quality in Translation Studies has roots in organizational theory and management studies (Grbić 2008, 236). From here it borrows several key terms, such as quality management, quality control, or quality assurance, which will be discussed further below. While today quality in general is a fashionable term, it still lacks a uniform definition in its original field, and in Translation Studies, this problem is even more pronounced (ibid.).

On the other hand, there seems to be agreement on two points:

a) "quality is not objectively given" (Schäffner 1998, 4)

b) with objectivity unattainable, consistency should be strived for in the form of "intersubjective reliability" (ibid.)

While in literary translation different perspectives on quality may lead to a fruitful discussion, in institutional translation intersubjective reliability is highly desirable because it has a significant impact on the evaluation of translators (Zehnalová 2015, 87). In the case of the EU, a consistent approach to quality reigns supreme in legal translation where all language versions have an equal effect and must provide same legal interpretation (Drugan, Strandvik, and Vuorinen 2018, 41) (discussed further in Section 2.3.1). Furthermore, in all translating institutions, translation plays a central role in presenting the image of the institution, be it in media, publications, or online content (ibid., 42). Without a common understanding of quality, the institution's image would be inconsistent.

For these reasons, the governing principles and criteria of quality have become a frequent subject of research (see Mossop 1990 on the Canadian government; Koskinen 2008 on the European Commission; Mason 2004 on the EU parliament and the UNESCO). What becomes a suitable definition of quality differs between types of institutions, depending on their organizational structure, translation policy, or target audience. For example, Mossop proposes acceptability by the market as a sole translation quality criterium (Mossop 2000, 41). In a different study, he explores the definition of quality as zero defects and finds it unmanageable (Mossop 2006, 19). Although theoreticians often like to speak about translation as a form of art, there are inescapable economic factors that influence how quality is perceived. On that account, especially in publicly funded institutions, quality may become politicised. Pym (2015)

proposes a rather pragmatic view of translation as risk management where quality may be interpreted as a result of decision-making that minimises both risk and effort.

Two other approaches to quality are worth mentioning. These are, as discussed by Grbić (2008), quality culture and quality as compliance with standards. They may be distinguished based on either diffusion or concentration of authority over quality among agents. The two approaches constitute two poles of a spectrum between a fully democratic process of achieving quality whereby "members [of an institution] assume collective responsibility for upholding quality" (Grbić 2008, 246) without any "formal quality assurance measure" (ibid.) on the one side, and a possibly elitist system where quality is at risk of becoming an arbitrary self-serving concept. Both approaches are imperfect since the former lacks a formal foundation to safeguard consistency and the latter only shifts the problem of defining quality to the issue of defining a standard. Difficulties with devising criteria for quality may arise even within a single institution because they might differ between text types. For instance, Constantinou notes that "[t]ranslation strategies differ even within the EU translation policy in relation to the genre the target text (TT) belongs to" (2020, 4).

Somewhere between the two poles we may identify a third, functional approach that does not aim at a general standard, yet it emphasises consistency and coordination. Functional approach, spearheaded by the *skopos* theory (Reiss and Vermeer 2013) is aimed at the needs and expectations of end users by putting emphasis on the purpose (*skopos*) of the product. Under this approach in an institutional setting, quality is achieved in cooperation between translators with their expertise and the normative force of the institution realised by the institutional voice. This approach is closely linked to the fit-for-purpose principle. However, there are some conceptual differences that are characteristic to the context of the EU institutions (Pym 2000, 9–10) (see Section 2.3.4 below).

Fitness for purpose may become problematic when there is a gap between the "customer" (end-user) and the "provider" (the institution). Since translation purpose is defined by the institution, if the institution is detached from its readers, purpose is gauged based on speculations about their expectations[4]. Indeed, translators may find

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[4] Note that the DGT quality management framework integrates customer and end-user expectations in its core fitness-for-purpose principle, which is operationalized in its comprehensive processing of quality feedback (see Drugan, Strandvik, and Vuorinen 2018).

themselves questioning the very existence of their readership and may see their work as a purely bureaucratic task (see translator interviews in Koskinen 2008). In this respect, it is crucial that the customer–provider gap be closed or prevented by ensuring bilateral communication, or that translation goals set by the institution be regulated by a control measure, such as an international standard.

Skopos theory and the fitness-for-purpose principle alike may run into problems with specifying desirable textual qualities because these may vary with the many possible text types and translation purposes. This issue is resolved by refocusing quality from translation as a product to translation as a process. Focus on the quality of processes is more specific to institutional translation and is mainly represented in the widely recognized ISO 17100:2015 standard. Preceded by the EN-15038:2006, it is now the foundation for certification of translation service providers worldwide. Apart from the translation process itself, the standard covers human resources, that is, qualification requirements for translators, revisors and other agents, as well as pre-production and post-production processes including project preparation or handling of client feedback (International Organization for Standardization 2015). Compared to the previous standard, the ISO 17100 newly sets minimum standards, particularly the requirement that every translation be subjected to revision by a second person. It is also due to this requirement that the ISO certification is more suited to translating institutions. While self-employed translators may also apply to be certified, they must attend to this requirement, e.g., by commissioning a reviser (Pich 2014, 28).

Revision is one of the two general types of quality control defined by the standard, the other one being review. Revision is a "bilingual examination of target language content against source language content for its suitability for the agreed purpose" (International Organization for Standardization 2015, 2). The goal of a review is identical, but the process is monolingual, and focus is thus only on the target text (ibid.). Other key terms that are worth mentioning are quality management, quality assurance, quality assessment, and quality control. Drugan et al. define quality management as "the totality of policies, methods, processes and procedures designed and implemented to achieve the product and service quality objectives set" (2018, 40). It is thus an umbrella term that includes the other three terms. Quality assurance, sometimes used synonymously with quality management, is understood as the actions taken before, during, and after the translation drafting process in order to achieve the desired quality. Quality assessment is the judgment whether and how much a

translation product meets the established quality criteria. Lastly, quality control consists of the abovementioned revision and review and refers to making sure that translations meet established quality criteria (ibid.). While the latter two have received relatively more scholarly attention, it is the holistic account of quality management that is gaining importance as translation services are growing in productivity and complexity (ibid.).

The development of international standards marked a general increase in importance of translation quality management. The European Union gradually introduced the requirements of EN-15038 as a benchmark for its tenders and, as a result, an increasing number of agencies sought certification of conformity (Biel 2011, 61). At the same time, the translation services of the EU institutions were outsourcing more and more of their assignments which – together with other reasons – led to the need of a more comprehensive quality framework (Strandvik 2017a, 52). Central to the work on translation quality management is the DGT of the European Commission, which decided to base its framework on the ISO 17100 (Drugan, Strandvik, and Vuorinen 2018, 40). To meet the specific needs and conditions of the DGT environment, the requirements provided by the standard had to be supplemented with a structure of practices to get a comprehensive framework. As it is expected that this framework will be eventually adopted in other EU institutions as well, it will be briefly described in the remainder of this section.

The EU translation happens in a specific context that constrains quality management in multiple ways. Therefore, several factors had to be considered when developing the quality management framework (Drugan, Strandvik, and Vuorinen 2018, 42). First, there are eight translating institutions and seven independent translation services in the EU. They are located in either Brussels, Luxembourg or Frankfurt. Second, translation happens on a very large scale and in many language combinations[5]. According to the DGT statistics, the translation service produces approximately 2.2 million pages a year (Directorate-General for Translation 2021, 5). These conditions make it challenging to achieve a consistent approach. At the same time, consistency is especially important because the EU texts

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[5] In theory, all the EU's official languages yield up to 552 combinations, but in practice most texts are translated from English, so the number is considerably smaller (Drugan, Strandvik, and Vuorinen 2018, 42).

are characterised by a high degree of intertextuality and long textual history, particularly in the case of legislation (Drugan, Strandvik, and Vuorinen 2018, 43).

Legal texts play a central role in the European context, especially since translation of the *acquis communautaire*, i.e., the EU legislation in force, is a prerequisite to joining the EU (Wagner, Bech, and Martínez 2002, 107). Given such importance, legal translation has influenced the practices of translating non-legal texts, leading to a negative perception of the EU discourse (Koskinen 2000, 56) (see Section 2.3.4). As a consequence of this fact, together with the adoption of the international standard, the gradual systematization of the DGT's approach to quality included a shift of its basic principle from fidelity to fitness-for-purpose (Strandvik 2017b, 130). However, given the EU's policy of multilingualism, there are still several constraints on the permissible degree of shifts in translation (see Sections 2.3.1 and 2.3.4)

The current system used in the DGT translation service is set out by the DGT Quality Management Framework. Under this framework, quality is defined on the basis of the ISO 9000 standard as "the degree to which a set of characteristics fulfils stated or implied needs and expectations" (Directorate-General for Translation 2014, 1). The framework further defines the main principles of the DGT's approach, described by (Strandvik 2017a, 55–57) as follows:

a) focus on processes, in correspondence with the ISO standards,

b) quality management as the management of knowledge, in the sense of sharing previously tested practices, since translation practices needed not be invented from zero but only systematized,

c) matrix structure for quality management, i.e., appointing quality managers and creating other structures to improve cooperation throughout the translation service.

The key concepts of the framework were later operationalised in the DGT *Translation Quality Guidelines* that take into account the specificities of different text types, provide their categorization and recommended practices for each category (Directorate-General for Translation 2015) (see also Section 3.5). These two documents together with language specific guidelines create a three-layer model of quality management. At the top is the abstract quality management framework

followed by the general guidelines and the language-specific material at the bottom (Drugan, Strandvik, and Vuorinen 2018, 47–48).

As Drugan et al. note, a comprehensive quality management framework "empowers and motivates translators. . . [b]ut at the same time. . . limits translators' margin for manoeuvre" (2018, 62). This is essentially because consistency needs to be balanced with systemic, cultural, and idiosyncratic differences between languages and translators. The balance is illustrated by the nature of language-specific guidelines which are the least structured layer of the three (see Section 2.3.4). Previous studies mention that when the development of a quality framework is too detached from the translators' experience and when they are not included in the process, it can – in combination with little feedback on their work – cause them frustrations and decrease their motivation (Koskinen 2008, 103; Plassard 2020, 80). Therefore, it seems crucial that translators are active participants in quality management. Otherwise, the institution runs the risk of enforcing too much of a prescriptive system of norms that might in the end fail to convey its values and ideology.

2.3 Translation of the EU Institutions

This section discusses translation in the EU institutions from other perspectives than quality management. It particularly describes the topics of previous research and what it is that makes translating of the EU texts specific from the point of view of Translation Studies.

2.3.1 Multilingualism

The policy of multilingualism was established by Council Regulation No. 1/1958 and is recognized as one of the fundamental principles of the European Union. It stands behind the plurality of official languages used in the EU as well as the associated right of European citizens to reach out to its institutions in any of the 24 languages and receive an answer in the same language. Multilingualism necessarily follows from democracy and the right to know (European Union and European Commission 2004, 17); it is viewed as a logical consequence of the EU's core values. In close relation is the principle of equality before law which constitutes the primary reason for multilingualism (Wagner, Bech, and Martínez 2002, 2). This naturally gives translation and interpreting a central role as tools to "safeguard the ideals of

democracy, transparency and linguistic equality" (Koskinen 2008, 63). Multilingualism is therefore the main determining factor of the translation policies of all European institutions as all legislation and official communication with the public must be translated into all official languages unless it is intended only for a subgroup of member states, such as the euro area.

A discussion on the merits of multilingualism was sparked in 2000 whose subject boils down to the two opposing trends brought about by globalization: the spread of English as a *lingua franca* (ELF) and a simultaneous increase in translation demand (House 2015, 101). The backdrop to this discussion was also the Finnish accession to the European Union in 1995. In anticipation of further enlargement[6], Pym (2000) raised the question of economic and pragmatic factors of extending the number of official languages. Every newcomer entails a large increase in workload necessitating admission of new staff and additional funding. Additionally, some countries may lack the academic background necessary to provide sufficient numbers of qualified translators, especially in the case of some less-used languages like Finnish (Pym 2000, 9). In the end, Pym argues, "the massive learning of *lingua francas* might be more appropriate than the training of new armies of translators" (ibid.).

On the other hand, Koskinen (2000) takes more of an ideological stance, claiming that the primary function of translation is sometimes not in fulfilling communicative needs but in providing a symbolic value. To Pym's objection that the equalitarian policy of multilingualism is simply repression of stateless languages (2000, 13) Koskinen responds in defense of "the ideal of linguistic equality" and highlights that there are also practical reasons for access to information in multiple languages whereas the use of *lingua francas* would put their non-speakers into a far more disadvantaged position (Koskinen 2000, 52). She also admits that while the function of multilingualism is essential, translation with little communicative purpose is problematic. When translators no longer serve as intermediaries, it can have serious impact on their motivation and professional identity (Koskinen 2000, 51). Pym acknowledges the symbolic value of translation but suggests that the cost-benefit ratio be weighted, and in case the costs of translation cannot be reduced – for example by

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[6] The largest expansion of the EU, called the "Big Bang" enlargement, took place in 2004 when ten countries including the Czech Republic joined the Union.

employing machine translation for those texts whose value is predominantly or solely symbolic – then the policy of multilingualism should be reconsidered (Pym 2000, 9). A third perspective is proposed by House who suggests that a distinction should be made between "languages for communication and languages for identification" (House 2003, 559). Like Pym, House claims that teaching ELF would free resources, which could then be used for other, various means of supporting all European languages, not only those chosen as official by Member States (ibid., 562). She concludes that ELF should be neither completely rejected nor unconditionally accepted, but more research must be carried out to find its optimal use as a working language.

To this day, the EU has reacted to the increasing demands on translation services by increasing the rate of outsourced assignments and by lowering costs by increasing efficiency (Strandvik 2017a, 52–53). From hindsight, Pym's concerns seem to have been unfounded. Even after considerable expansion of the EU, the costs of maintaining multilingualism arguably outweigh its benefits. In the 2018 EU Labour Force Survey, 180,000 translators and interpreters were counted in the EU amounting to 0.1% of total employment (Eurostat 2019). Translation costs of the largest translation service, the DGT of the European Commission, as of January 2021 were €349 million or 0.2% of the EU budget (Directorate-General for Translation 2021, 5).

Even so, it should be mentioned that translation in the EU holds a rather paradoxical status. Despite its significance, the establishing documents omit mentioning it explicitly. The Council Regulation stipulates that "all languages are equal or equally authentic" (Wagner, Bech, and Martínez 2002, 7). In this regard, translations are not really translations but language versions (ibid., 8). Yet strictly speaking, one cannot expect that all versions have an equal effect. Pym makes a convincing case stating that "if the EU were so culturally homogeneous that equal effects did result, there would be little ideological justification for extensive translation practices in the first place" (2000, 6). This sort of a make-believe view on the *a priori* equivalence assumed by the multilingualism policy is generally agreed-upon by researchers, although different scholars use different labels, such as "fiction", "construct", or "illusion" (cf. discussion in Wagner 2001). It is also not unique to the EU context. Mossop (1990) observed the same authenticity requirement in the translation policy of the Canadian Translation Bureau. In more general terms, the illusion of authenticity is widely recognised and is present in the work of multiple

scholars, namely in Venuti' translator's invisibility (1995), House's covert translation (1997) or Nord's instrumental translation (1991).

In practice, it would be absurd to assume that language versions are drafted in parallel as equivalent originals. Therefore, translation must be employed, putting the notion of equality into question. For translation to happen there must be a source text and a source language which automatically becomes "more equal" than the others. In the case of the EU institutions predominantly English. In fact, the proportion of English in translation is tremendous. According to the statistical overview of the DGT of the European Commission, as much as 86.8% of translation is done from English (2021, 7)[7]. The position as a source language alone gives English primacy compared to other official languages because in those cases where the English version is accessible prior to other language versions, translations are often left unread (Koskinen 2000, 52). It is also common for internal communication in the EU institutions to resort to a *lingua franca*, so English or French are more likely to be heard in an everyday conversation (O'Driscoll 2001). In some institutions, the use of *lingua francas* has found opposition in the proponents of a so-called "*lingua receptiva*" (House 2015, 101). It describes a situation when each speaker uses their native language and communication hinges on speakers' inferences and their passive competence in the other languages. It is now frequently practised in workplace discourse as well as other environments (ibid.). It has been also observed in carrying out research for the present thesis at the ECB, in which case it depended on the closeness of the languages concerned; for example, Czech and Polish. On other occasions, English or French was the default.

The present status of English is by all means dominant which confirms that multilingualism is an illusion. Yet, it should not be taken as a mere charade or a political term. The conception of translations as equally authentic texts has significant implications for both the translation and the drafting of the source texts. While the English version is usually drafted first, it is done mainly with the intention to be translated, and translators are often its only receivers because further English versions are created later in the process. This practice results in a loss of directionality, one of

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[7] The role of EFL is now even more prominent since after Brexit the only two countries with English as an official language left are Malta and Ireland.

the supermemes of translation (Chesterman 1997, 8), and led to questions whether it should be in fact still called translation (Pym 1992, 130–31); it indeed resembles rather creation of "functionally identical parallel texts" (Pym 2000, 6)[8].

Texts that are predestined to be translated into multiple languages can be expected to lack culturally specific elements. These would make close translation impossible which would in turn make the language versions more heterogeneous; an undesirable quality of texts that are portrayed as authentic equivalents. One may thus argue that the source text creator applies an inverse of a "cultural filter" (House 2015, 68) to create a text that is acultural and primed for translation with minimal shifts required. This "internationalisation of texts" is characteristic of the modern global translation market and, aside from the EU institutions, it is typical for the localization industry (Pym 2004b, 36)

It is not only the texts and their relation to culture that are subject to changes in the EU environment, but the notion of culture itself. In multicultural environments, contact may lead to convergence, resulting in hybridity or a transformation into a new, independent cultural entity. This phenomenon will be discussed from the perspective of several prominent studies in the following section.

2.3.2   EU Culture

One of the core principles that are constitutive to institutions is the adoption and preservation of values (Scott 2014, 24). In the European Union, the fundamental goals and values are laid out in the Lisbon Treaty and the EU Charter of fundamental rights, and they are human dignity, freedom, democracy, equality, rule of law, and human rights. Of importance to translation is the value of equality which is closely related to the policy of multilingualism – as was illustrated above. The motivation behind multilingualism is also illustrated by the value of "unity in diversity". As the motto suggests, the EU prides itself in representing many different cultures with their languages. From a linguistic standpoint, multicultural environments produce specific texts.

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[8] The theoretical implications of this configuration of the translation process are discussed in Section 2.3.3.

It was first observed by Trosborg (1997) that texts produced by the EU display qualities resembling a combination of multiple cultural linguistic conventions – they are "hybrid". In this type of text, "linguistic expressions are levelled to a common, (low) denominator" (ibid., 151). They also contain fewer grammatical structures, neologisms and universal concepts. Trosborg cites loyalty as one of the factors determining the cultural characteristics of a text (1997, 148). It would then seem that for the hybrid EU texts loyalty is split between the cultures of individual official languages. For Pym (2000), the issue transcends textual characteristics and indicates existence of a new community, an "interculture" derived from "the intersections of territorial cultures" (Pym 2000, 11). As an emergent cultural entity, Pym theorizes that EU institutions may influence not only European languages but also training institutions (ibid., 12).

Koskinen (2000) goes one step further and provides a different explanation. To her, "the institutional framework constitutes a frame of reference with its own history, shared knowledge, norms and aims" (2000, 58–59). Therefore, qualities that have been described as hybrid are in fact characteristic of the EU's own cultural discourse. It should be noted that Trosborg's description was mainly focused on legal translations where multiple formal constraints apply, such as the full-stop rule where each language version must contain a prescribed number of full stops (ibid., 152). To that end, Koskinen (2000) highlights that legal texts can be seen as only one of three text groups produced by the EU institutions. She provides two categories for classifying non-legal documents: intra- and intercultural. Intracultural texts are those that fulfil communication needs within and between EU institutions. They are then hybrid only from the perspective of a national culture; they conform with the EU culture. Intercultural texts should not contain hybrid characteristics. This would indicate that translations are made with no regard for the target culture (Koskinen 2000, 59). According to Venuti, institutional translation is governed by the ethics of sameness, i.e., loyalty to domestic conventions (1998, 82). Koskinen (2000) suspects that in the EU context, sameness pertains rather to the mutual relationship between language versions than to that with the target culture, and it is therefore the principle behind the hybridity of EU translations that has spread from legal texts to a more general discourse (2000, 57).

To test Koskinen's statements, which are in essence a testimony of her professional experience, Calzada Pérez carried out a critical discourse analysis of

speeches from the European Parliament and she found no shifts that would be evidence of a different culture (2001). Along the same lines, Mason (2004) found no consistent shifts in analogous texts. However, both authors remind that larger-scale systematic research is necessary. Koskinen reacted by explaining that the notion of EU culture was presented merely as an insider's feeling of belonging, or identity, that is not necessarily based in material (Koskinen 2004).

The different opinions on Koskinen's model thus stem from a different view of the very concept of culture. One particular issue might be with the assumption that signs of a culture can be examined on translations (Koskinen 2004, 149). In a similar vein, Pym (2001) protests against the labelling of translations as hybrid and claims that they are rather the opposite as they demarcate the line between languages and cultures, thus supporting the ideal of "pure or natural language use" (2001, 195). In relation to the EU context, the word *ideal* is significant. As Pym illustrates, the progressing internationalization and use of *lingua francas* results in hybridization of *source texts*. Translations then act as "agents of dehybridization" (Pym 2001, 205). Yet, whole communities, including translators, are subject to the hybridizing processes and may become victim to their influence. In sum, while Trosborg began the debate on hybridity as a trait of translations, the discussion in a dedicated issue of the academic journal *Across Languages and Cultures,* including Pym's article, lead to the conclusion that hybrid texts come from an intersection of different cultures, which can also be the case of original text production in a particular cultural space (Schäffner and Adab 2001, 300).

2.3.3 Place in Translation Studies

Translation Studies began to pay more attention to the EU environment in 2001 as demonstrated by a special issue of the Translation and Interpreting journal *Perspectives* on the topic "Language work and the European Union". Among the contributors, namely Cay Dollerup, Radegundis Stolz, and Susan Šarcevic, was Christina Schäffner who – acknowledging that EU translation as a niche is a relatively new topic – expressed doubt about the applicability of contemporary theoretical concepts in Translation Studies (Schäffner 2001, 248). This opinion was seconded by Wagner (2001) who rejects the term EU translation as a misnomer and instead opts for

the form "translation for the EU institutions" (2001, 264). She further argues that even this concept is too diverse to be treated as a single area of research.

Wagner (ibid.) claims that traditional concepts of Translation Studies cannot be applied to the translation for EU institutions because it is highly purpose-oriented and cooperative. It should be clarified that by "traditional labels of TS" Wagner refers to the study of literary texts and the translation of Bible (ibid., 263). I believe that her issue is mainly with the conceptualization of EU translation as a single entity and that its purpose-driven diversity can be sufficiently grasped by the *skopos* theory (Reiss and Vermeer 2013)[9]. However, her second point of the highly cooperative nature of this type of translation deserves more theoretical consideration and brings new translation problems. These problems were partially discussed in the preceding sections of the thesis. This section will summarise them from the perspective of TS and compatibility of its theoretical concepts.

First, there is the issue of agency. It is important to realize that EU translators are not only a part of a team of linguists. After all, that is the case in many other translation contexts. What seems to be more unique to the context of EU institutions is the fact that translation is only a minor stage in the larger drafting process and there are also other important agents, such as legal or economic experts and not least politicians, who have arguably a more decisive impact on the final text than the translators themselves (Wagner et al. 2002, 56). This is related to the issue of a translator's visibility. Towards the outside readerships, invisibility of translators is hardly solvable because they form part of the institutional voice. What should rather be addressed is the internal invisibility that can be solved by increasing "awareness of the different factors involved in a multilingual and collective translation process" (Koskinen 2001, 298), e.g., in the development of a quality framework. What should also be borne in mind is the fact that translation impacts the creation of source texts because the drafting process is nonlinear.

Second, as already mentioned in Section 2.3.1 above, the increased complexity of the drafting process leads to a blurring of the notion of a source text and its pairing to a target text; one of the established supermemes in Translation Studies (Chesterman 1997, 8). As Koskinen explains (2001), instead of the traditionally

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[9] First published in 1984.

defined dichotomy there are different "versions" that are interconnected by a complex system of authorships and drafting processes. As a result, a translation may be based on multiple texts or it may itself become a source for other translations (Koskinen 2001, 294). The increased interaction of texts and their predetermination for translation cause the law of growing standardisation (Toury 2012, 303) to take effect already in the drafting process.

Third, the relation of text to culture is equally problematic. "We easily assume that languages, cultures and nationalities are always interlinked and their borders overlap" (Koskinen 2001, 296). In the EU context, the connection is disrupted and cannot be taken as invariable. As a result of progressing internationalization, source texts are becoming arguably more hybrid than translations (Pym 2004a) and cultural embeddedness of texts cannot be regarded the same.

Fourth is the notion of equivalence. "It is one thing to argue that substantial equivalence is an illusion, but quite another to understand why anyone should be prepared to believe in it" (Pym 1995, 165). The communicative function of EU translations may be overridden by their symbolic value. In such cases, economic factors may push the limits of what is acceptable as an equivalent. In stark contrast to TS, equivalence as a concept is by no means considered defunct. Instead of pondering its existence or possibility, *a priori* equivalence extended to multiple language versions instigates thoughts about how it is operationalised in different contexts and for different purposes.

Lastly, the research into translations in the EU institutions seems to be much more rewarding when focused on the process as opposed to the product (Koskinen 2001, 299). The discrepancies between TS and the institutional environment were further addressed in a number of publications, especially in the context of legal translation where its challenges have been felt the most (see Biel 2019 for a review). There is, however, no comprehensive theoretical framework yet. Such framework will have to somehow bring into accord the cultural with the linguistic approaches as well as the descriptive and prescriptive ones. In translating institutions, all these aspects seem to play significant roles. As concluded by Sosoni, "the translation theory for EU texts. . . is—just like them—hybrid" (Sosoni 2011, 76).

2.3.4 *Institutional Style (and Discourse)*

Institutions are shaped by and through discourse (Kress, 1995). Without giving further regard to how and why the EU discourse has emerged, it is worthwhile to briefly discuss its characteristics and how it is perceived by the EU institutions themselves. It is now relatively common that the EU is criticised for its idiom labelled Eurospeak, the language of Eurocrats, or eurojargon. When first described by Trosborg (1997) the eurojargon was characterised by "features that somehow seem 'out of place'/'strange'/'unusual' for the receiving culture... [which, howerer], are not the result of a lack of translational competence or examples of 'translationese', but evidence of conscious and deliberate decisions by the translator" (Trosborg 1997, 146). More specifically, EU texts often display:

- complex sentence structure,

- overuse of abstract nouns,

- extensive overnominalisation,

- reduced vocabulary,

- meanings that tend to be universal,

- reduced inventory of grammatical forms,

- use of complex noun phrases. (Trosborg 1997, 151)

While this style of discourse may lead to incomprehensibility, Eurospeak is not wholly unjustified. Especially when referring to new, supranational concepts, the use of nationally accepted terms might lead to confusion (Wagner et al 2002, 64). Other times, an EU term is introduced for convenience, such as the use of plural in Czech *politiky* for *policy* that is almost exclusively associated with the EU context and thus does not require further specifying. Consequently, the EU translators are faced with the task of accurately conveying the transnational reality of the EU environment, while avoiding unnecessary jargon. In this respect. The EU institutions have not been idle. Numerous guidelines promoting clear writing methodology developed by the European Commission's editing unit have been published and adopted by other EU translation services (Directorate-General for Translation 2012).

The European jargon is not always perceived negatively. In some countries, it was either not registered or accepted, such was the case of Spain at its accession (Pym 2000, 5). By contrast, Finnish accession spurred heated debates (ibid.) and the Danish public needed a separate commentary to the translated legislation to understand it (Trosborg 1997, 154). Pym reasons that acceptability of the EU jargon is associated with general attitudes toward the Union. However, apart from political views, linguistic aspects may also play a part. Differences in perception of Eurospeak among European countries do not come as a surprise once we acknowledge that Eurospeak does not have a single form. In fact, we may distinguish different "eurolects" depending on the effects it has on individual target languages and cultures via translations (Stolínová 2015). Certain languages may be more or less pliable in terms of accepting the European discourse which would influence how perceptible it is to native speakers. Admittedly though, the abovementioned criticisms are not always founded on empirical findings, favouring Pym's ideological hypothesis (cf. Stolínová 2015 on the Czech eurolect).

Going back to the role of the EU institutions in managing their discourse, the clear writing campaign was of course not the only effort to yield a material guideline. As described in Section 2.1 above, guidelines and manuals in general are a vital component of institutional communication because they ensure consistency within an institution to preserve its identity. In the case of the EU, consistency is also important between institutions. For that purpose, the EU has in place the Interinstitutional Style Guide in all 24 official languages that is binding to all writers. Since under the multilingualism policy, *a priori* equivalence puts translation effectively on a par with the drafting of source texts drafting guides should be theoretically binding to translators as well, at least within the scope applicable to their language (Drugan, Strandvik, and Vuorinen 2018, 45). In practice, translators are more engaged with shared translation memories and terminological databases (personal correspondence 2021). Other guides and reference materials are produced on institutional level (cf. Sections 2.2 and 3.5). Perhaps the most comprehensive inventory of style guides for translators is the DGT's website entitled "Guideline for translation contractors". To the author's best knowledge, it is also the only one that has been comprehensively analysed for research purposes (cf. Svoboda 2013, 2017, 2018). As Svoboda notes, style guides may be quite extensive, as long as over 1 000 pages (the case of the German style guide in the DGT) (2013, 96). In general, the

European translation services have amassed the most extensive and comprehensive resources to date. Despite significant improvements in organization of the materials, there remains a degree of variation between languages and especially between institutions (Svoboda 2017, 75).

Part of an ethnographic approach to translation is seeing translation practices in connection with the discourse of the studied environment (Flynn 2010, 118). Examples of said discourse could be the discussions that take place as part of the on-boarding process of new staff or frequent topics of "water cooler conversations". It is also an essential complement to the study of the translation department as a community of practice representing a particular culture (Koskinen 2008, 40–42). To include this area of research into a more comprehensive study of the European Central Bank, comments files could potentially serve as a material for analysing workplace discourse (see for example King 2018 on discourse in communities of practice). While the role of workplace discourse should not be omitted, it is beyond the scope of the present study.

3   THE CASE STUDY: TRANSLATION PROCESS IN THE ECB AND COMMENTS FILES

3.1   Role of the ECB

The European Economic Community (EEC), that is, the predecessor of the EU, was established as an economic union with the idea of fostering peace by creating mutually dependent nations based on trade (europa.eu). In a sense, economic cooperation at the European level has a longer history than the political one, but despite this head start there remain further steps towards a full economic union that have not been completed. The official website of the European Union cites among future challenges fragmentation in tax systems or separation of financial services markets (europa.eu n.d.).

An important steppingstone to the European integration set out in the Treaty on the European Union is the formation of the Economic and Monetary Union (EMU), part of which is the adoption of euro as a common currency. While the union brings indisputable benefits, such as greater stability and efficiency of financial markets (Scheller 2006, 46), entering the euro area requires a country to meet extensive convergence criteria also set out by the Treaty. Without delving into the

macroeconomic technicalities, the challenge of economic integration can be summed up by the inherent antinomy of bringing nations closer together while preserving their individuality, a challenge that is cherished with the very motto "Unity in Diversity". Further challenges arise from differing public opinions. As evidenced by the latest survey of countries that are yet to enter the euro area (Directorate-General for Economic and Financial Affairs, European Commission, and Directorate-General for Communications Networks, Content and Technology 2020), the question of adopting the euro is highly controversial, possibly due to a lack of awareness and knowledge among citizens. Overall a very slight majority of the population feels sufficiently informed about the currency while a similar proportion is in favour of its introduction. On the latter topic, there is less agreement between individual countries with Czechia being against adoption (63%).

The institutions of EMU, who manage the abovementioned objectives of economic integration as well as stability and joint growth are:

- The European Council,

- The Council of the EU,

- The Eurogroup,

- The European Commission,

- **The European Central Bank**,

- The European Parliament. (European Commission n.d.)

Because the responsibility for economic policy is shared by the Member States and the EU institutions, the European Central Bank carries out its tasks jointly with the National Central Banks of those Member States whose currency is euro, forming the head financial authority called the Eurosystem (European Central Bank 2015). Furthermore, given that the monetary union is not yet complete, the ECB must also cooperate with national central banks of those Member States who have not adopted the euro. These groups together form the European System of Central Banks (ESCB). The two banking systems (the ESCB and the Eurosystem) with the ECB at their core were established by two pieces of legislation: the Treaty on the Functioning of the European Union, which also lays down their basic tasks and the primary objective of

maintaining price stability; the Statute of the European System of Central Banks; and of the European Central Bank. Importantly, this legislation gives the ECB legal personality and ensures its independence from the rest of the EU institutions and bodies. There is impartiality that operates both ways, as set out in Article 130 of the Treaty:

> When exercising the powers and carrying out the tasks and duties conferred upon them by the Treaties and the Statute of the ESCB and of the ECB, neither the European Central Bank, nor a national central bank, nor any member of their decision-making bodies shall seek or take instructions from Union institutions, bodies, offices or agencies, from any government of a Member State or from any other body. The Union institutions, bodies, offices or agencies and the governments of the Member States undertake to respect this principle and not to seek to influence the members of the decision-making bodies of the European Central Bank or of the national central banks in the performance of their tasks.

Its political independence gives the ECB a special standing among the European institutions. For instance, the ECB has its own budget, may issue binding regulations, and has a separate system for testing and hiring its staff (Scheller 2006, 124). However, the motivation behind independence goes back to the main objective of price stability as it gives central banks a better ability to curb inflation (European Central Bank 2017). The ECB fulfils its main objective by carrying out other tasks of its monetary policy, such as setting key interest rates, analysing risks, or performing market operations.

Another important role of the ECB is in banking supervision. With the establishment of the Single Supervisory Mechanism (SSM), the ECB was entrusted with overseeing the safety and soundness of the European banking system in cooperation with the national supervisory authorities of the participating countries. The main decision-making body for both monetary policy and the governance of the SSM is the Governing Council. However, it follows a strict separation principle to prevent conflicts of interest (*Council Regulation (EU) No 1024/2013* 2013). This means that the meetings of the Governing Council are held separately according to the matters discussed. The main consequence of the ECB's dual role is that on the outside it acts as two separate entities. From the perspective of translation, the important implication is that for each of its two roles the ECB manages websites, issues publications, holds conferences and gives speeches separately. This includes publishing two different Annual Reports, which are then presented to the European Parliament at a public hearing.

In carrying out both its supervisory and monetary policy functions, the ECB puts high emphasis on the principles of credibility, accountability, and transparency. When the bank maintains stability in the banking sector successfully, the value of the euro is reliable and public confidence should be undisturbed. This in turn helps the ECB with its policy transmission, creating a self-perpetuating cycle. However, when the citizens' trust is for whatever reason shaken, transparency and accountability become crucial. As former president of the ECB, Mario Draghi, acknowledged in one of his speeches, communicating the bank's policy to those affected by it is not only conducive to its transmission but it is part of its substance (Draghi 2014). In fact, the ECB has previously been criticised for a lack of transparency (cf. Bini Smaghi and Gros 2001; Loedel 2002). In addressing this issue, Bini-Smaghi and Gros argue that the problem arises from the outside perception rather than objective issues (2001)[10]. Moreover, the ECB actively engages with the public when holding public consultations before adopting a regulation as required under the Treaty.

It is apparent that the reputation and efficiency of communication of the ECB hinge on the recipients. The implications of how policy statements are versed, and the effect of their interpretation is an under-recognised variable in macroeconomics (Holmes 2019). This approach, which has been adopted by researchers under the term narrative economics (for further research, see Holmes 2019; Tuckett et al. 2020), stresses the role of communication and, by extension, that of translation. As was already discussed above, the translator effectively adopts the voice of the translating institution and therefore partakes in its accountability. Considering the possibility of communication being equally important as the primary instruments of central banks (Holmes 2019, 3), it becomes obvious how vitally important it is to attain the highest possible consistency between the "actors" of the institutional voice. One way of increasing consistency is seemingly the incorporation of comments files into the translation process.

Another source of plurality in the ECB's voice is its tight cooperation with the National Central Banks (NCBs) of Member States. The translation in the ESCB is based on a decentralised model, which means that translators at the ECB maintain

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[10] Indeed, my personal experience as a trainee corroborates high emphasis being put on transparency and accountability, for example by providing the translators with dedicated training on clear writing, storytelling, political correctness, and other subjects to ensure continuous professional development.

contact with linguists from their respective NCBs to discuss matters of terminology as well as to cooperate directly on shared translation projects. For example, the work on the ECB's Annual Reports is often divided between the ECB and the NBCs depending on working capacities. The ECB translators also pay regular working visits to their NCBs (Tcaciuc 2012, 97).

3.2   Publications

The ECB publishes a relatively large variety of documents. Some are published regularly, some reflect recent developments, and not all of them follow the same translation policy. Athanassiou explains (2006, 25–27) that the ECB's publishing activity can be divided into four categories: legal acts, legal instruments, internal administration, and external communication.

The first category includes ECB regulations, decisions, recommendations, and opinions. These are the types of legislation issued by the European institutions under the Treaty establishing the European Community, which also sets out their application and legal binding force.

The category of legal instruments is distinguished in the sense that it is exempted from the language rules that apply to the ECB's legal acts as well as to the publications of other EU institutions. It is due to the fact that "the ECB is not a Community institution in the proper meaning of the term" (Scheller 2006, 43) which allows the bank to decide on the languages in which their legal instruments are drafted based on the target audience (Athanassiou 2006, 24). Legal instruments comprise guidelines and instructions that are legally relevant only within the Eurosystem.

Generally, only those documents that are published in the Official Journal are subject to the multilingualism policy and must be published in all official languages of the EU (ibid., 26). What documents are to be published in the Official Journal is dictated by the ECB's Rules of Procedure (RoP) as well as by its reporting obligations that are specified in multiple pieces of EU legislation (Tcaciuc 2012, 92).

The third category, namely internal administration, is not further described by Athanassiou, but the RoP specify, for instance, Administrative Circulars as the means of appointment and promotion of staff. Internal administration is also subject to the principle of transparency under the RoP.

The group of publications intended for external communication is more diverse due to the ECB's "differentiated language regime" (Athanassiou 2006, 26) that allows for a choice of languages on a case-by-case basis. According to Athanassiou (ibid.), this category includes the ECB's communication within the two banking systems (Eurosystem and the ESCB) that is carried out in English, and communication with other national authorities or bodies as well as directly with the European citizens that is carried out in their respective languages. Furthermore, this category includes ECB's interaction with financial markets which also takes place in English as the primary language of finance (ibid.). Publications under the reporting obligation, commonly called statutory publications, such as the Annual Reports or Convergence Reports, also belong to this category and are published in all official languages in compliance with the principle of multilingualism (Scheller 2006, 139). Note that since 2015 the ECB's Monthly Bulletin (now called Economic Bulletin), another official publication, is no longer translated into other official languages and only its summary is published by individual NCBs in their respective languages (Česká Národní Banka n.d.). Moreover, the Introductory Statement that used to be part of the bulletin is now presented at the press conference of the Governing Council and published in all official languages.

Finally, the ECB maintains two websites, one for its monetary policy function and general communication with the public, and one for its supervisory function. Both websites are regularly updated and feature numerous sources of information from statutory publications, press releases and speeches to interviews, research articles, and blog posts.

Regarding the language status of the websites, publications are accessible in all existing language versions and the remaining text is partially translated into several or all official languages of the EU. It has been reported that the content is mainly in English (Tcaciuc 2012, 92; Athanassiou 2006, 26), however, the number of translated pages has been growing and a considerable portion is now multilingual (ecb.europa.eu). The larger degree of translation is related to the fact that the main ECB website has recently undergone an extensive re-design. This speaks for the truly high emphasis put on communication with the public.

Koskinen notes:

> EU texts are not famous for their interpersonal and emotional power. On the contrary, in public discourse these texts are often considered bureaucratic, technical, repetitive,

or legislative, and seldom seen as instruments for building attachments or creating personal relations. (2008, 50)

Nevertheless, the ECB recognizes the importance of contact with the public in carrying out its policy (European Central Bank 2008). Moreover, this step is only a part of an EU-wide trend known as a "participatory shift" (Koskinen 2008, 65; see also Bora and Hausendorf 2006). In the last several years, the EU institutions have extended the scope of their communication with the public by building their presence on social media (Koskinen 2010c, 139). From the translator's perspective, there are additional requirements for stylistic competence as evidenced by a compulsory training "writing for the web" (personal correspondence 2021) or the publication of a manuscript on web translation by the DGT of the European Commission (2009). The basis of the required competence is a high capacity to consider different readerships. Based on the different classes of publications described above, there are at least three distinguishable groups of audience (cf. Section 2.3.2).

The first group are other European institutions addressed in such documents as the transmission letter to the ECB's Annual Report or the ECB's reply to reports of the European Court of Auditors. These publications assume knowledgeable readers, so the main area of concern is the specific EU terminology as well as the particular discourse often labelled "Eurospeak" (Wagner et al. 2002, 63).

Second, the communication within the ESCB is generally addressed to other banks. For this type of audience, the specialised vocabulary of economy and finance is preferable, and usage of either a supranational or a nation-specific term should be considered depending on where consistency should be primarily achieved.

The third group is the general public consisting of European citizens. A degree of specialised knowledge is to be expected but readability should still be the primary goal. Given that the information provided by the bank can be both highly complex and significant for a European citizen, the ability to synthesise such information into an easily understandable format is an indispensable skill for every ECB translator. Accordingly, it is assessed as part of the staff recruitment process to the ECB translation service department (personal observation 2020).

3.3   Translation Service

The size and textual output of individual EU institutions are varied and so is the need for translation services. Naturally, this is reflected in the size of the translation departments. Unlike the dedicated Directorate General for Translation of the European Commission, which is the world's largest translation unit (Tcaciuc 2012, 83), the ECB's translation service falls within a common organisational unit with, for example, External Engagement or Media Relations, forming the Directorate General for Communications (DGC). The DGC further contains Language Services Division (LGS) which comprises all language units grouped into departments by their representation in the ESCB and a separate unit for technological and terminological services.

The organizational structure reflects the abovementioned distinction between legal documents (legal acts and legal instruments) and external communication. Since the two types of publications put very distinct demands on translators' competence, legal translation is assigned to a separate translation department where translators must prove their legal background by a degree in law. Notwithstanding the fact that LGS translators are not required to have domain-specific formal education, their work also involves highly specialised economic or financial texts which, however, have no legal force (Tcaciuc 2012, 93).

There are three plus one language departments in the LGS: the Multilingual Translation and Editing 1, 2, and 3 and the English Translation and Editing. In the first three departments, language units are divided by capacity – French and German as the largest languages – and by membership in the euro area. The Czech unit, therefore, shares the MTE3 department with Slovak, Polish, Danish, Bulgarian, Hungarian, Romanian, and Croatian translators. Technically, the Irish and the Maltese are also part of the MTE3 – despite being languages of the euro area – since they are not represented by in-house staff and all work in those languages is done by freelancers (personal correspondence 2021). Every language unit employs a minimum of two full-time translators who may share their work with freelancers and trainees. A special unit employing more translators is the English Translation and Editing department where translators also work as editors providing drafts for other language versions.

While this organizational structure may suggest that different units operate separately, there is considerable room for interaction. The reasoning behind the

linguistic segregation is related to differences in publications, meaning that there will be additional projects for euro area languages while there will still be the common core of texts published in all official languages. For those texts, it is not rare for translators to discuss their strategies or look for inspiration in their colleagues' solutions (Tcaciuc 2012, 224). Apart from that, language assistants and project coordinators work as intermediaries between the commissioners and the translators as well as between the translators themselves when spreading project-specific information and updates. An especially significant point of contact are the CFs (discussed in more detail in Section 4 below).

3.4   Drafting and Translation Process

In terms of translation research, it is important to differentiate between individual levels at which the translation process can be studied. Muñoz Martín (2010, 178) differentiates between three levels, comprising a) the translator's cognitive processes, b) the constitutive tasks of translation, such as typing or reading, and c) a broad, situated level that includes other agents and is rather centred around the text than the translator. Muñoz Martín also highlights the importance of the third level as it may enhance "the ecological validity of experimental settings" (2010, 179). A similar distinction is made by Svoboda (2013, 88) who talks of a translation process in a narrower sense – corresponding to Muñoz Martín's second level – and in a broader sense where he includes the choice of texts for translation, emphasizing the role of the whole institution beyond its translation service. Of course, the notion may be expanded even further to the general activities of an institution, since these processes also, albeit indirectly, influence the translation product (Koskinen 2008, 127).

When looking at the translation process as a cooperative activity, another useful distinction is to be made between primary and secondary communication. Primary communication represents the exchange of a message between the author of the ST and the target audience where translation is an act of intermediation. Enabling this communication is part of the essence of translation. On the other hand, secondary communication – in the sense used in this thesis – excludes TT recipients and is restricted to the interaction between all the contributors to the TT creation. In this case, translation is the subject of that communication, which itself also has an enabling function. Secondary communication is therefore in a subordinate position to the

primary one as it is a kind of metacommunication. It may occur in more or less formal ways, ranging from translation briefs, work correspondence to meetings and consultations, notably including CFs (discussed further in Section 0 below). The language of primary communication of the ECB is governed by the principle of multilingualism and by the ECB's language regime described above. Secondary communication takes place primarily in the internal working language of the ECB, which is English (Scheller 2006, 139).

In this section, the translation process is described in its broader sense, but still within the perspective of an individual translator of the MTE department. Typical tasks that in-house translators carry out will be presented linearly and divided into three phases proposed by Mossop (2000, 40): pre-drafting, drafting, and post-drafting. What should not be overlooked in the EU context, is the interaction between the often-overlapping processes of drafting and translation of the ST, which is connected to the notion of *a priori* equivalence (Koskinen 2000, 49). It should be therefore clarified that in the following paragraphs the term *source text* (ST) refers to the English text that translators receive in an assignment and *target text* (TT) is the *de facto* translation or the other-language version that they create. The term *draft* then refers generally to a text that is open to further changes and will be specified as either a ST or a TT draft. The three phases of the translation process are to be understood in relation to the TT.

The pre-drafting phase includes planning and preparatory tasks and may begin hours or months in advance, or it may be skipped entirely. Because there are different demands on individual language units, there is only a general common agenda concerning larger projects or regular publications, and otherwise, translators keep their individual schedules. Translations of the ECB's official publication are planned long ahead as their release dates are more or less fixed. In some cases, such as Introductory Statements to press conferences, the whole course of the drafting process is planned in detail and in writing for better coordination of translation participants, since other language versions are to be published as shortly after the conference as possible (Tcaciuc 2012, 100).

For irregular projects, translators are notified of the upcoming work every month by the assistants. The LGS assistants are responsible for setting up the agenda as far as deadlines are concerned, and they also work as intermediaries between translators/revisers and ST drafters so that they can coordinate the workflow from a time perspective. Their role as coordinators is significant because a translation

project from drafting of the ST to the completion of the TT seldom follows a strict timeline. For one thing, the ST drafting process includes multiple versions, some of which bring extensive changes and editing. Moreover, the ultimate number of ST versions is not limited in advance and can be quite extensive (Koskinen 2008, 120). For these reasons and to improve time efficiency, the drafting of TTs begins before the ST is finalised.

At the start of each assignment, translators receive an email containing the translation brief. The translation brief generally specifies the source and target languages, type of service required (translation, revision, proofreading, translation update etc.), number of pages, due date, and further instructions including links to reference documents (for a more detailed description, cf. Svoboda 2013, 91). Every assignment must also be accepted via the Translator's Dashboard, an internal workflow management portal. From there one can access information on the different stages of a project with scheduled deadlines, the current stage, and different participants including the commissioner (an ECB department or an individual employee), the coordinator and the language unit. In addition, the project page contains the recommended type of quality control to be performed. Individual translators then fill in their names and tasks performed on the assignment (translation/revision/review) and eventually check the completion box next to it to let the other participants know that the project may proceed to the next stage.

The drafting phase comprises translation in the narrow sense, which is mainly characterised by the use of technology and research tools, some of which are proprietary to the EU institutions. The LGS translators all work with the same CAT tool that utilizes server-based translation memories (Tcaciuc 2012, 96). It is the SDL[11] Trados Studio, which is used for most assignments; smaller-scale translations and updates for the ECB's web pages are carried out in Web Editor that is directly integrated into the ECB's website and can be accessed via a link included in the translation brief. Considering SDL Studio, the ECB uses a customized version with integrated tools, such as the .sdlxliff preview that translators can use to consult other language versions in the making without interrupting the work of their colleagues.

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[11] While the software concerned is most likely still recognizable under the brand SDL, its provider has changed in a 2021 acquisition to RWS, so the proper name is now RWS Trados Studio and RWS MultiTerm.

Another SDL software that ECB utilizes is MultiTerm for terminology management, where a custom layout is also used. Among the many research tools that all EU translators have access to is the DGT's large, shared translation memory Euramis, the IATE terminology database, or the DGT's neural machine translation technology eTranslation. A specialised metasearch engine called Quest is also exclusively available to EU translators. All these and other resources are also integrated into the Studio so that translators have a compact and ergonomic "workbench".

Intrainstitutional documents, including the finalised translations, all versions of the ST, and reference documents are stored in DARWIN: a digital server-based depository for sharing and archiving documentation. All ECB employees have access to DARWIN from the ECB's intranet or via a teleworking token that allows them access through a virtual copy of their work computer. A particular aspect of DARWIN is that every document is unique; there are no copies. By contrast, every document has a list of versions that can be accessed and compared. Furthermore, access to documents is governed by a confidentiality scheme that matches restrictions posed on documents with rights assigned to employees. Interaction with DARWIN is an integral part of every employee's workday, and as the system is quite rigorous, mandatory training on best practices is given to all newcomers.

In the course of translation, communication between participants takes place via individual electronic correspondence and at times via meetings that are held at a department level (Svoboda 2013, 92; personal correspondence). A more structured approach to coordinated communication is established in CFs (cf. Section 4.2 below for elaboration on the CF practices). The division of labour within a language unit is agreed on by the translators themselves. The ECB's translation service is characterised by relatively extensive cooperation with freelance translators, with up to 75% of jobs being outsourced (Wagner, Bech, and Martínez 2002, 20). Further support may be provided by trainees. In any case, however, at least one principal translator must be present in each language unit.

The post-drafting phase of a translation project is not formally separated from the drafting phase in which revision and/or review is done by another linguist in the same language unit. Nevertheless, for some publications translations are sent for revision to the National Bank (Tcaciuc 2012, 98). Still, a quick internal revision may be performed beforehand. In the case of the Annual Report, not only the revision but also the translation itself is shared with the NCB (ibid.). In other cases, translation may

be sent to the ECB's lawyer-linguists, mainly for a terminological review or consultation. Revision within a language unit is always applied when there are changes to the ST that need to be implemented, or when clarifications are received in a CF. After a translation is revised in the SDL Studio, typesetting may be necessary. This may be the case for instance when the text includes charts or figures that are translated separately, such as in the case of the Annual Report. Another example would be certain legal and official publications, for which a prepared template is applied by an application called LegisWrite.

It is crucial that translations that are uploaded to DARWIN be in fact final because they are subject to further procedures. These may be still included in the post-drafting phase but occur only after the translation is completed. The post-drafting phase in a broader sense includes ST-TT alignments to be imported into the ECB's main reference translation memory, terminology extraction and updates of termbases, or extraction of useful comments from previous CFs to be compiled in a separate reference document. The ECB's traineeship programme also has a significant place on the translators' agenda since one of the principal translators assumes the responsibility for the trainees' onboarding process and also serves as their contact person.

The workload at the ECB's translation service is intermittent and translators carry out the varying number of different tasks according to their own schedule. Time management is therefore a necessary skill. On the other hand, translators benefit from relatively flexible working hours. To the author's knowledge, the ECB does not utilize a timesheet to track its employees' performance. However, monthly statistics are kept based on the amount of work entered by translators for each assignment into the Translator's Dashboard; they are eventually presented at monthly department meetings. Trainings, meetings, and other work-related activities are recorded via the Outlook calendar. In addition, every ECB employee may spend a number of working hours on a teleworking arrangement, that is, working from home or other outside location.

In carrying out research for the present thesis, a transition to teleworking was necessary for most employees due to the pandemic restrictions. It may be reasonably assumed that this increased the demands on translators. Yet, this forced transition might have only sped up a more general trend towards remote working, which decreases the institution's overhead costs. The ECB responded to the crisis by offering its employees a contribution for improving their home working environment as well

as by increasing communication between workers by weekly remote meetings and providing them with a health information portal.

3.5   Guides and Quality Assurance

Quality Assurance in the EU institutions is an area of continuous development with many recent changes (see Strandvik 2017b for an account of the European Commission; Hanzl and Beaver 2017 for the Council of the EU), and the ECB is not an exception. As in every institution, quality assurance is an inherent part of the translation process (Strandvik 2017a, 52), but given the relatively small scale of the translation service, it is not necessarily as systematic or structured. Referring back to the three-layered model of quality management applied in the DGT, there seems to be no explicit version of the top tier (quality management framework) in the ECB. To the author's knowledge, there are no strict guidelines regarding general translation strategies. This would be consistent with the past findings of Koskinen on the European Commission where she observed that practices are rather commanded by the value of readability (2008, 146). Correspondingly, quality management at the ECB appears to be rather in the form of an ethos, a set of common practices (cf. Tcaciuc 2012, 99–103). Tcaciuc emphasizes that "[a]t the ECB, the use of translation aids, the collaboration with national contacts and the revision process are essential aspects, compulsory for almost each translated document" (2012, 111). Nonetheless, she does not refer to any general guidelines or an explicit framework.

That being said, the ECB does dispose of a quality *assessment* framework for outsourced translations. In this framework, the LGS lays down guidelines for external contractors regarding translation resources, briefly describes a standard of quality, and communicates how translations are assessed and how feedback is provided. Considering the facts that in-house translators and external contractors share the same workload, that materials for external contractors of DGT are being used by internal translators as well (Svoboda 2017, 98), and that contractors have the option to acquire "a token" giving them access to the ECB Intranet, the following description attempts to describe the ECB's framework in general drawing mainly on its materials for contractors.

According to the guidelines, optimal quality is achieved by two means. First, translators are required to complete trainings whose focus may range from

technological skills to areas such as clear writing, political correctness or writing for the web (personal correspondence). Second, translators are expected to refer to guidelines and other resources, such as translation memories, terminology databases, and various language-specific reference materials included in the "MTE Info Pack" available from the ECB intranet (European Central Bank n.d., 3). Contractors working remotely have limited access to these materials, and therefore must rely more heavily on the quality assessment result and feedback they receive during and after their work on an assignment. For in-house translators, the opposite is at times true. There might come situations when principal translators must complete an assignment on their own, which means that they have to revise their own work (personal correspondence 2020). Such scenarios emphasize the role of translation tools, such as translation memories and terminology databases, but also communication tools like CFs.

Apart from its quality assessment framework, the LGS has only recently in 2020 implemented a formal framework for quality control (personal correspondence 2020). At the time of research, the framework was not yet fully developed and implemented. For that reason, only a brief account can be given here, relying heavily on similarities with the longer established framework of the DGT, which has taken a presumably similar route of development in recent years (Strandvik 2017a).

Based on a risk assessment, several categories of revision and/or review are defined. These differ by the scope, ranging from full revision to spot-checks, and generally are assigned according to text type. Recommended type of revision/review is communicated as part of the translation brief. The *DGT Quality Guidelines* distinguish between four text categories:

A. Legal documents,

B. Policy and administrative documents,

C. Information for the public,

D. Input for EU legislation, policy formulation and administration.

(Directorate-General for Translation 2015, 4)

Texts under each category are specified in terms of function, purpose, translation requirements, and important aspects to consider. Furthermore, the recommended minimal level of quality control is justified by statements of risks associated with mistranslations for every category. In the same vein, admissible reductions in QC for cases of extreme workload are also listed. In relation to the MTE translation

department, mainly categories B and C are relevant, including publications, such as financial statements, reports, press releases, or web texts.

The *Guidelines* operationalized the fit-for-purpose principle of the quality management framework and made it more explicit; a relatively recent development at the DGT (Strandvik 2017a, 58). A similar development may be expected to take place at the ECB as well, particularly due to the frequent changes of staff; the MTE keeps only one or two permanent translators per language unit (Tcaciuc 2012, 99). While the *Guidelines* are quite comprehensive in their recommended translation procedures, they still include expressions like "accurate", "idiomatic", "read like originals" that are dependent on the translator's representation and understanding. For this reason, it is crucial to ensure a common and elaborate conception of quality between translation participants. This remains a challenge even in the latest DGT framework (Drugan, Strandvik, and Vuorinen 2018, 56). The proposed solution lies in coordinating communication by means of comments files (ibid.).

Concerning the bottom tier of quality assurance – i.e., language-specific guidelines – the situation at the ECB is, based on the author's observation, again comparable to that of the DGT, only narrower in scope. Translators refer to the IISG for basic conventions of orthography or grammar and use materials that language units gather individually (personal correspondence 2020). A systematic study similar to that on the DGT carried out by Svoboda (2017, 75–108) might reveal discrepancies between language units and benefit the management of quality in general.

4 COMMENTS FILES

4.1 Definition

The following section contains a description of comments files that is based on the author's observations and materials from the MTE3 department of the European Central Bank. A mention of an analogous tool in a different institution was found in Svoboda's study (2013, 92) of the European Commission. The practice of using CFs in the DGT is also noted by Drugan et al. (2018, 56) as a way of ensuring coordination within the comprehensive quality assurance system in place. Their form or use is not further described there. As a result, the following discussion may not be directly applicable to the work procedures of other EU institutions.

As suggested by its name, a comments file is a digital document that is editable in MS Word or any suitable word processor. It is created at the beginning of a translation project and shared with translators as part of the translation brief. It is essentially a copy of the document to be translated that is stored on the ECB's intranet so that all translators who have been assigned the project have access to the same copy. Whenever a translator needs to ask for clarification or wants to make a comment on a particular part or the whole of the ST, they can do so by inserting a comment in MS Word. This constitutes the first stage of the process (Stage 1). Depending on the scale of the translation and the timeline of the whole project, the coordinator sets a deadline for adding comments that is also specified in the translation brief. In the second stage, after the comments have been made, the comments file is sent to the ETE department – since most source texts are written in English – where the translators' comments are addressed by an editor or consulted with the author if necessary (Stage 2). Likewise, a deadline for answering comments is set ahead as part of the project timeline. After the answers have been appended, the translators are informed that they can now complete or revise their translations accordingly (Stage 3). This is the final stage of the process, unless there are multiple consecutive drafts of the ST or any issues are left unresolved, in which case the exchange may be repeated as long as the project deadline allows (see all three stages illustrated in Figure 1).

The above description has covered the fundamental characteristics of a comments file, so a final synthesis can now provide a working definition. A comments file is a **communication medium** used **for a phased discussion** that takes place **between translation participants** about **a specific text** in the form of **a shared digital copy** of the text concerned.

The following section provides a more detailed description of the work with CFs and a further discussion of some of its aspects.

4.2   Work Practices and Purpose

The idea to implement comments files originated in the translation of official ECB publications that are being translated and published monthly (*Other Decisions of the Governing Council*), quarterly (*Macroeconomic Projections*), or annually (*Annual Report)* (personal correspondence 2020). These publications may show a significant degree of intertextuality and form what Koskinen calls "text chains" (2008, 125),

meaning that their contents refer to previous issues. In some cases, e.g., Introductory Statements to press conferences, most of the text may be identical or needing only minor changes. Therefore, there are expected to be recurring issues that translators would need to discuss with the editors to ensure that their interpretation was correct. In light of the number of target languages, it becomes clear that addressing translators' queries directly to editors would be overwhelming. CFs were thus first incorporated into the translation of these documents to streamline the associated communication and give it structure.

When CFs were newly introduced, answers would be provided to translators by the head of section (personal correspondence 2020). Alternatively, there would be an additional step between the first and the second stage when the head of the department would preview the comments, give whatever answers s/he was readily able to provide and pass the rest to be consulted with the editor/author. At the same time, as a third party, s/he could provide feedback to the translators regarding the clarity or general appropriateness of their queries; one can easily imagine how a person immersed in their work could opt for more implicit expressions than perhaps desirable.

Nowadays, CFs are used for translations of official publications as well as texts for the web. There is now no strict policy on which translations should include the use of CFs, and generally, only minute translations and translation updates do not include them. CFs are especially useful wherever translators need to familiarize themselves with new areas and/or where they have insufficient contextual information. One of such cases would be the *Guide to climate and environmental risks* where the ECB either introduces new terms or talks about new policies whose operation and/or implementation is not shared with the translators in advance. For illustration, consider the two following ST phrases:

1. environmental degradation, such as air, water and land pollution, <u>water stress</u>, biodiversity loss and deforestation,

2. the European Banking Authority (EBA) was given <u>several mandates</u> to assess how Environmental, Social and Governance (ESG) risks can be incorporated;

and their accompanying comments:

1. Q: Can this be translated as "shortage of water"? Is there a difference with "water scarcity"?

A: Water stress and water scarcity can be used interchangeably for the purposes of this definition.

2. Q: Several successive mandates? Or several simultaneous mandates for different objectives?

A: Several simultaneous mandates all converging on the same theme, as outlined here.

A slightly different situation comes with interinstitutional texts which require a different translation strategy than those aimed at the public (Koskinen 2000, 58). For these texts, CFs are particularly useful for clarifying references to official documents and institutional terminology that may vary from one EU institution to the other. See, for example, the following:

Q: Why differentiate between building and real estate here? Is it that ECA uses the term "building strategy" whereas we would prefer to call it "real estate strategy"?

A: Yes, correct.

The management of a comments file of a typical translation project is assigned to the principal translator of one of the language units, who shares the task of project coordination with the project assistant. The associated tasks are essentially what the head of section would previously do: checking the functionality of the file, passing it from one stage to the other, and shortly previewing the comments beforehand. This role is regularly passed on between the principal translators of all the units in the department.

When a larger project is divided between in-house translators and external freelancers or the translation service of an NCB, as may be the case of the Annual Reports, the access to CFs may be restricted for external workers because it is stored on the ECB's intranet where every file has a set level of confidentiality, and every user is assigned appropriate permissions. If the external translator cannot access the intranet, comments are communicated by the in-house translators or the project assistant. NCBs may be forwarded a copy of the comments file that is merged with the online version at the end of Stage 1.

In special cases, especially when translators work with graphical elements such as charts and figures or parts of web pages, a separate CF is reserved for technical issues that are then addressed either by the technological services unit or the IT helpdesk. Such a CF is either created in the usual form of the ST (for example when

there are many hyperlinks that may malfunction) or as a simplified compilation of issues or questions. In the latter case, the sole purpose of the CF is to report an issue only once and likewise to provide the solution to all translators at once. The communication may not be as structured as with regular CFs, and thus its form and function may vary.

After a translation project is finished, the CF is archived on the intranet and may be annexed to the translation brief of future projects as a reference document. As the number of archived CFs increases, especially those related to consecutive issues of the same type of publication, the informativity of individual files decreases since comments are less readily accessible. For this reason, several translators were assigned the task of "mining" the most useful points of discussion in the CFs to be used in a separate reference document. In this case, MS Excel spreadsheets are used, and individual issues may be elaborated with an additional explanation, examples, or hyperlinks to other reference documents. The mining of comments became a regular practice that is again assigned to a translator chosen depending on current workload and time capacities (personal correspondence 2020). Furthermore, the mining process provided new space for assembling useful information, so the final collection of extracted comments may contain information from other sources, such as work correspondence.

Given the small scale of the ECB's translation service, variability of solutions is more permissible and there is not a strong need for a systematic framework of every aspect of the translation process. For the same reason, it is common for staff members to take on additional tasks as needed, subject to their working capacities, such as mining of comments. There is one more example of this flexibility of working procedures based on the author's observation.

Quite recently, the translation department has established a practice of compiling a daily economic digest from an exclusive news feed provided to the ECB directly by news agencies (personal correspondence 2020). The aim of this task is simply to reduce the amount of information to only the most relevant to the translators' current work and share it in a condensed form. The role of the compiler would be usually passed on weekly between members of the whole MTE3 department, but frequent arrangements were made to suit the individual's workload.

These two examples illustrate how the ECB's translation service works as a cohesive unit, which is arguably a necessary requirement for achieving consistency

between all language versions. They also show that despite appearing as a small unit in the system of European institutions, the translation service is self-sufficient and dynamic, which reflects ECB's independence.

4.3   Communicative Situation, Register Analysis

To paint a more comprehensive picture of CFs and their position in the translation process, the following section lays out a communicative model adopting the analytical framework by Biber and Conrad (2009). Biber and Conrad developed a methodology for register analysis that comprises three steps:

1. Identification of situational characteristics,

2. Analysing typical (pervasive) linguistic features,

3. Interpretation of the relationship between situational characteristics and pervasive linguistics features in functional terms. (Biber and Conrad 2009, 7)

To describe a communicative situation, Biber and Conrad suggest a set of characteristics that potentially distinguish registers. Their classification was applied to CFs and is presented in Table 1.

Situational characteristics	
Participants	
A: Addressor	translators – plural/institutional; specialist
B: Addressee	plural, undetermined/institutional
C: Onlookers	other translators, coordinators/assistants
Relations among participants	
Interactivity	highly interactive, structured interaction
Primary and secondary roles	asking/answering questions making/taking remarks about the ST
Social roles	equal status, translators' relative sovereignty
Personal relationships	colleagues/employees – professional, shared institutional environment, corporate culture, multiple cultural and linguistic backgrounds
Shared knowledge	considerable, overlapping, but not completely; assumptions about shared specialist knowledge; different cultural/linguistic backgrounds, common use of English as a *lingua franca*
Channel	
Mode	written
Medium	electronic-permanent, spatially and thematically constrained
Production circumstances	
planned, structured-(routinized), situationally constrained, periodical	
Setting	
Time	phased, planned, asynchronous contemporary (+archived)
Place	(inter-)institutional setting, participants separated
Communicative purposes	
General	objective discussion
Specific	to clarify, create intersubjective mental representations of a text; to give/ask advice, supplement contextual information

Factuality	translators – speculative/opinion
	editors – factual
Stance	epistemic
Topic	
General domain	workplace, economics, translation
Specific topic	central banking, monetary policy, banking supervision, EU discourse

Table 1 Classification of situational characteristics (Biber and Conrad 2009, 45) applied to comments files

The addressee is described as undetermined or institutional, meaning that the comments are aimed at whoever is competent to answer without the translator's prior knowledge, or interest for that matter, who it is going to be. However, it will always be a person associated with the ECB, which is the official institutional author of the publication.

The relationship between the participants with respect to the texts involved is that of relative sovereignty. Specifically, translators are given higher authority over the TT because they may decide to work on their translation without consulting the CF. On the other hand, the authors and editors are sovereign with the ST simply because the translators can access it only at a later stage.

It should be also noted that the specific topics will vary largely depending on the specific text but only within the thematic scope of the ECB's publishing activity; raising any other issue would be unconventional and might be considered misplaced (personal observation 2020).

The characteristics of the communicative situation described above are summarized schematically in Figure 1.
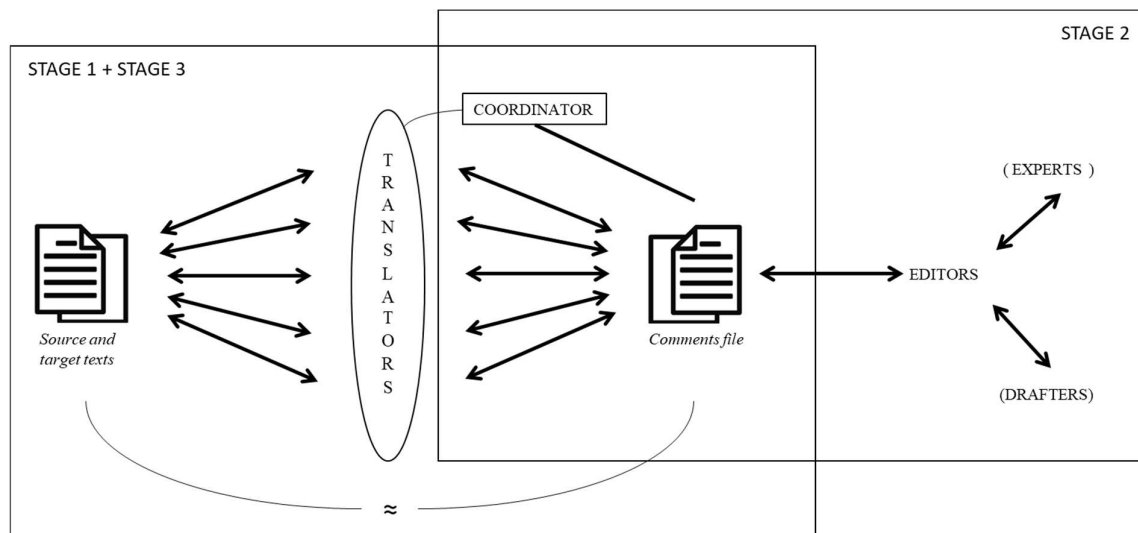
Figure 1 The communicative situation of comments files in the translation process

The main participants in the communicative act are the translators, who also take turns as coordinators, and editors. Editors may consult the original drafters of the ST or other experts if necessary. The process is dynamic and interactive as illustrated by the double-headed arrows. The translators engage with the CF and the ST at the same time as they are drafting their translations. The two rectangles represent which participants engage with the CF at different stages of the communication. Translators interact with the ST and add comments in Stage 1, and they are excluded from Stage 2 where their remarks are addressed. Stage 3 virtually corresponds to Stage 1 except that the flow of information is reversed, that is, from the CF to the translators and then to the translation. The coordinator fulfils a mediating role which is seen from the area of overlap of the two rectangles.

One aspect of the drafting and translation process that is not included in the model is the case when the translators' comments lead to a revision of the ST, in which case the editors/drafters come back to the source text, make changes, implement them in the CF and the process may be repeated again from Stage 1.

4.4   Comments files as paratexts

Comments files can be thought of as a type of "paratexts" (Genette 1997). In its original sense that was adopted by Translation Studies, the term paratext is applied to literary texts where it may refer to any authorial productions, such as titles, forewords, or notes. Although putting the term into use inside the context of institutional

translation is bound to have flaws due to some inherent discrepancies, applying a looser definition to the concept, which is in any case variable (Genette 1997, 3), makes it possible to draw a useful parallel that will provide structure to the following description.

Unlike a preface or a foreword, CFs are not destined to reach the end-reader but are actually used by their creators. This means that there is no *a priori* informative value in each CF and the insights provided as the discussion unravels may not be equally relevant to all participants, that is, all the recipients of the CF.

Another contrasting point is that whereas there are generally multiple paratexts belonging to a single main text, the situation with CFs is the opposite. The writers of all the language versions contribute to the same CF that primarily belongs to the English draft, to which the other versions are assumed to be equivalent.

As with a prototypical paratext, the information provided in CFs is "legitimated by the author... [and] at the service of a better reception for the text and a more pertinent reading of it" (Genette 1997, 2). The goal is to disambiguate and clarify any problematic passages in order to align the interpretations of all the participants and arrive at an intersubjective reality that is to be conveyed by the text as if told directly by the institutional voice.

Every CF has an inherent self-referential quality because the main text that it accompanies is by definition contained within it. The implication arising from this concerns referencing, since translators have indexical tools at their disposal, such as highlighting and positioning of their comments.

The content of CFs is highly dynamic and interactional. A question that one translator poses or an answer that they receive may affect how other translators phrase their queries and if they raise them in the first place. This dynamism is further enhanced by the fact that CFs are written alongside the main texts. What follows from this aspect is that there is a tighter relationship between the two than in the case of usual paratexts because of the possibility that the main text is adjusted based on input from the CF. This practice was occasionally observed at the ECB, although it is disputed by Koskinen who claims that "the translator is both physically and mentally removed from the drafting process" (2008, 142). In any case, there is indeed space for amendments of the "original" ST while the language versions are being drafted, which can create additional and often unnecessary work (Wagner et al. 2002, 80).

Lastly, CFs have normative potential. On the one hand, seeing the comments of their colleagues, translators may express any uncertainties they might have otherwise resolved by their own judgment. On the other hand, since all CFs are archived and stored for future use as reference tools, any suggestions or solutions provided within them may act as a precedent that influences translators' decision-making.

5 METHODOLOGY

5.1 Theoretical considerations

The present thesis should be viewed as a small-scale contribution against the backdrop of a larger body of ethnographic research of the translation process. As such, it recognizes the need for multiple methods and perspectives (Koskinen 2008, 5), and therefore is not intended to produce conclusions or generalizations. Koskinen (ibid.) divides her research design into three levels, a study of the institutional framework, of translators themselves, and of the texts they work with. While the analysis conducted in the present study focuses only on texts, it still observes the ethnographic principle of studying both the whole and the particular (Koskinen 2008, 37). To that end, another principle of ethnography is the use of multiple methods and forms of data. Correspondingly, the findings of the analysis are supplemented with insights gained by the author's experience in the studied environment. The next ethnographic principle is the central role of the researcher's inside-view. Since this leads to an inherent subjectivity, more emphasis is put on exploration and description than on interpretation or conclusions. Finally, the concept of situatedness is especially important. Translation is here considered a contextualised social behaviour, and for that reason, both the linguistic and the sociocultural aspects must be addressed inseparably.

Apart from these general guiding principles, there is no unified way of conducting ethnographic research (Koskinen 2008, 37) so the choice of methodology is problematic. This is also due to the large number of different approaches applied throughout the history of Translation Studies. Calzada Pérez faces the same challenge and attempts to close the divide between linguistic and socio-cultural approaches (2001, 206). Alternative classifications to this imperfect dichotomy have been proposed (cf. Chesterman 2005). Nevertheless, since language use cannot be separated from its sociocultural context, empirical research will require considering different

aspects of reality depending on its purposes and goals. In any case, a rigid categorization can unnecessarily impede research where these considerations do not neatly fit into the theoretical scheme. Calzada Pérez (2001) proposes a three-part methodology, consisting of a descriptive, an explanatory, and an exploratory component. For the purposes of description, she adopts the stance of Critical Discourse Analysis (CDA) whose main tenet is "the existence of close links between all tangible communicative devices (such as words, grammar, images...) and the institutional and ideological settings in which communication takes place" (Calzada Pérez 2001, 207). To a degree, the CDA stance is also adopted here to investigate the mutual status of agents in the translation process, namely the translators and their "consultants" be it English editors, officials, or experts. In the explanatory part, Calzada Pérez suggests that the researcher draw on analytical tools of pragmatics and semiotics, which the present analysis will also make use of. Finally, the exploratory part relates findings to the macro-context of a society, which the present thesis will leave to potential follow-up research. As stated by Koskinen, bridging the gap between linguistic and cultural studies is a promising but an extremely ambitious endeavour (2004, 152).

Overall, the present analysis combines the two postmodern approaches (Koskinen 2004, 152): the ethnographic approach of Koskinen (2008) and Calzada Pérez' three-level methodology (2001). In more specific terms, the primary focus is on describing a sample of comments files retrieved from the ECB's archives, while published language versions of the texts discussed in the comment files are used as a secondary source for data triangulation. Indeed, previous empirical studies (Stolínová 2015; Nováková 2019) concluded that investigating a specific setting, such as an EU institution, from a Translation Studies perspective necessitates that the analysis include both translation as a process and a product. On the one hand, a target text analysis alone cannot reliably explain or assess translators' decisions because they need to negotiate sometimes contradictory extratextual influences (Nováková 2019, 48). On the other hand, any conjectures derived from the observations of a translation process are pointless if they are not verified against the resulting product. To that end, published translations are evaluated to complete the interpretations of matters discussed in CFs and to see whether or how the discussion manifests in the TTs. Considering the problems of translation quality assessment discussed above, the comparative analysis does not attempt to make evaluative statements based on a framework of quality criteria. It will rather assume a descriptive approach with the aim

to identify influences on translators' decision-making and possibly suggest areas or mechanisms in the translation environment for further investigation.

The descriptive analysis of CFs was carried out in two steps, one qualitative and one quantitative. The qualitative step consisted of a heuristic exploration to identify characteristic linguistic features and devise a classification scheme that would group them in a comprehensive manner by their function. This classification is then applied to a smaller sample of CFs to quantify the prevalence of individual functional features. The identified function of CFs is presented in Section 6.3 followed by a discussion on other possible uses in Section 6.4.

5.2 Categorization of Comments Files

Based on the abovementioned heuristic analysis, four main categories and one subcategory were identified: **Participation**, **Direction**, **Orientation**, and **Focus** (plus the subcategory **Reference)**. Every category groups together a set of mutually exclusive features and takes on one of two or three values. All categories are described below in order and each value is explained with the relevant category.

Participation characterises the way *translators* phrase their comments and can be either <u>active</u> or <u>passive,</u> expressing their engagement with the issue discussed. Active comments may only seek verification of the translator's interpretation or specify what exactly poses a problem. They often take the form of a yes/no question and can be generally answered briefly. Passive comments, on the other hand, leave the issue more open and without assumptions. This shifts more work to the editor but also spares him/her with additional clarification in case the assumed interpretation was incorrect. To provide an example, a typical active comment asks: *Does this mean A or B?* while an analogous passive comment would be phrased *What does this mean?* While expressing assumptions may be lengthier than asking an open question, the category Participation is not concerned with verbosity or brevity of comments. Note that even a passive comment may be rather lengthy, e.g., *Just to be sure, please explain what X here means. Thank you.* While it is certainly polite, it does not try to spare the addressee's effort in answering by trying to "meet him in the middle". A less prototypical example of an *active* comment is the following: *Is this a real word? Webster and Oxford don't seem to know it*. By adding the second sentence, the translator adds more contextual information to his/her question and supports it by

stating implicitly that s/he has already made some effort before bringing the issue to the editor. Consequently, the addressee has a clearer picture of the translator's motivation behind their comment, which facilitates the response.

The second category is called **Direction** as it specifies at which *text* the comment is primarily aimed. Comments that request information on the TT will be labelled queries, while those that say something about the ST are called proposals. Queries are consistent with the main intent behind CFs that the addressee facilitates the translators' work on the TT by providing information. With proposals, the participants' roles are reversed, and translators are the ones providing information to potentially enhance the editors' work on the ST. Proposals vary from pointing out factual inaccuracies or formatting issues to stylistic suggestions.

Orientation is aimed at the *stance* translators/editors adopt towards the information they require/offer. Under this category, comments can be either objective or subjective. Objectively oriented comments contain or request information about the substance while subjective comments are concerned with the way the information is to be used. Subjective orientation is associated with procedural information and translating/drafting strategies. The translator either asks for an opinion on their solution or suggests an action from the addressee. Subjective orientation could, therefore, be also labelled strategic, while objective orientation is centred on the subject. A typical formulation of a subjective comment is *Can I translate X as Y?*

Lastly, the category **Focus** is the only one that acquires one of three values. It looks at the *information* or the topic of a comment as viewed from the perspective of both the addressor and the addressee. The three possible values of Focus are broadly based on the framework of Systemic Functional Linguistics (SFL) developed by M. A. K. Halliday (Halliday and Matthiessen 2014)[12]. The SFL approach establishes functional relationships between elements of different semiotic systems of language (phonology, morphology, semantics, syntax...) and their use in a social context. One of the language systems, or dimensions in Halliday's terms (2014, 20), is the system of metafunction. Halliday identifies three metafunctions: ideational, interpersonal, and textual (2014, 30). The ideational metafunction stands for how we use language to "make sense of our experience" while the interpersonal is "acting out our

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[12] First published in 1985.

relationships" (ibid.). The textual metafunction is in a sense subordinate to the first two as it refers to how language is used to structure and organize text that performs ideational and interpersonal metafunctions (ibid., 31).

In a close relationship to the metafunctions, Halliday further speaks of contextual parameters that characterise any communicative situation where language and other semiotic systems are used. These are called field (ideational), tenor (interpersonal), and mode (textual). Focus reflects the prevalent contextual parameter and the associated metafunction of language in a particular comment. In parallel to the three parameters, focus of comments can be <u>factual</u> (field-dominated), <u>stylistic</u> (tenor-dominated), or <u>formal</u> (mode-dominated). Factually focused comments are aimed at denotative meaning. Contrastively, stylistic focus is here used to mean socially sensitive, taking into account the presumed reaction of the audience. Stylistically focused comments are thus rather a matter of appropriateness than factual accuracy. Lastly, formal focus refers to the surface structure where – crucially – the underlying meaning is not at issue.

Focus on form is usually easy to identify, such as in cases of missing punctuation, but there are also borderline cases between formally and factually focused comments. In such situations, it is important to see the whole context, that is, including the provided response. Consider the phrase *economic developments in the countries concerned are reviewed*, taken from a Convergence Report primarily concerned with Latvia (European Central Bank 2013, 7). A translator comments rather briefly, *Singular?* asking about the plural form *countries*. From his/her perspective, the singular form fits logically into the context, and the use of a plural might be a typo. Therefore, his/her comment is focused on form. However, when inspecting the answer *Even if the report is only covering Latvia, the plural is fine here as this is a more general statement*, it is apparent that changing the word into a singular would actually alter the intended meaning and thus would not be only a matter of form. For this reason, this comment is classified as having factual focus.

Focus is the only category that takes into account not only the comment but also the response to gain insight into what kinds of problems encountered in the translation process spur discussion. The author acknowledges that the comments analysed may offer multiple plausible interpretations and that the analysis was carried out without access to the translators' explicit reasoning or motivation. Consequently, the true nature of the issues concerned could be only deduced from the combination of texts

(ST–TT) and the provided answers. For this purpose, all answers were assumed to be relevant to the questions asked in the comments. If an answer complemented the context and allowed for a meaningful interpretation, that interpretation was considered correct.

Of the three possible values of Focus, the factual one is further distinguished into two types under the sub-category **Reference**, which are labelled intentional and contextual factual focus, or intentional/contextual reference for short. Alternatively, they can be described as parallel to <u>endophoric</u> and <u>exophoric</u> reference, respectively. Comments with intentional (endophoric) reference discuss textual matters that relate to the author's choice of words and his communicative intentions. Contextual (exophoric) reference is based in a broader context outside the communicative act of the textual pair (ST–TT) concerned. Importantly, this distinction impinges upon the translators' possibilities of researching on their own. Since intentional reference is to a higher degree subjective and context-dependent, the original author of the source text might be the translators' only source of disambiguation. A comment with intentional reference *par excellence* deals with structural/syntactic ambiguity. Comments with contextual reference, on the other hand, deal with situations where it is reasonable to assume that the addressee of the comment is not the translators' sole appropriate source of information, such as in cases of terminology (except for neologisms or ECB specific uses of terms), contextual information at a supra-institutional level, and issues of intertextuality.

To illustrate the categories Focus and Reference in pragmatic terms, they were mapped onto Pierce's semiotic triangle, which is shown in Figure 2. In this arrangement, stylistic focus lies with the interpretant as it is associated with perlocutionary force, that is, the effect on the reader (Searle 2011). Formal focus is analogously aligned with the sign, or representamen, because neither semantic nor pragmatic meaning is at issue. Factual focus is stretched between object and interpretant with exophoric focus associated with more objectivity and endophoric with subjective interpretation. It is useful to view these categories in pragmatic terms because there are not always clear boundaries between them; just like it cannot always be determined whether meaning lies in language or in context (cf. Bezuidenhout 2009; Green 2009). One of the factors influencing the category Reference is the degree of knowledge overlap between translators and authors/editors. This may surface in

opinions on lexicalization of phrases and contextual use of terminology. What the author may consider a term, might be an ambiguous phrase to the translator.
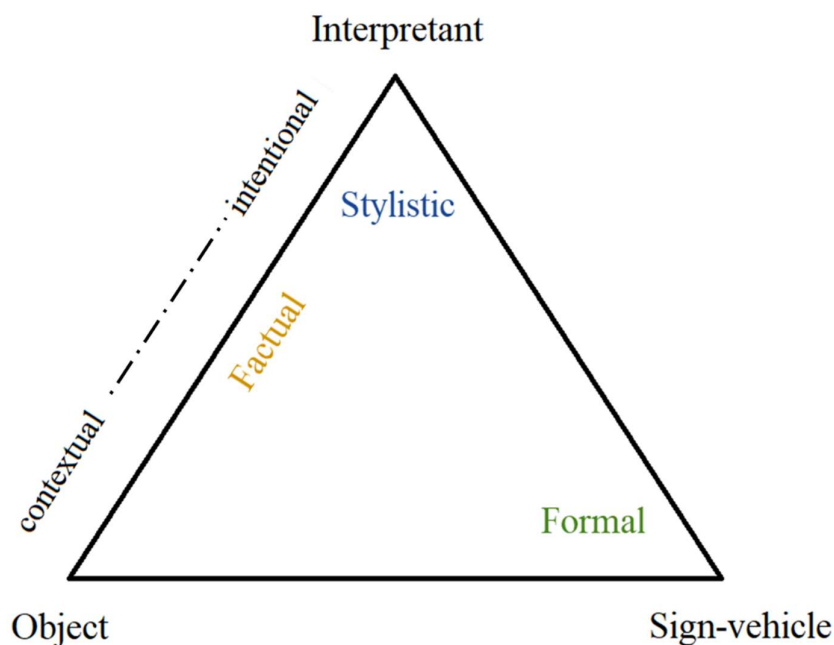
Figure 2 Values of Focus and Reference arranged on Pierce's semiotic triangle

After a comment is classified in all four – possibly five – categories[13], it becomes a token representing a particular type. Based on the number of possible variations of values among all categories, there are 32 possible types of comments. Each type can then be identified by a unique noun phrase (NP) assembled from its features. The identifying features are coupled into NPs in the following order: Participation, Direction, Focus, (Reference), Orientation; and using the following labels for syntactic convenience: Active/passive,   query/proposal,   factual/stylistic/formal, (exophoric/endophoric), subject/strategy. An example of a comment type would then be "An active query on a factual exophoric subject".

Some values will naturally co-occur more frequently than others because the phenomena captured by individual categories are not strictly demarcated. For instance, strategically oriented comments automatically imply more passive participation since they require more consideration from the addressee. They cannot simply provide the

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[13] For reference, see individual categories and their possible values assembled into a scheme in Annex II

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requested information. They must also think about other reasons for which the suggested solution might be inappropriate. Strategic orientation thus includes a tacit shift of responsibility, which would not be covered by the category Participation alone. However, even for the less likely combinations of features, there are reasonable tokens. For example, proposals seem by definition active since the translators are not expected to try and improve the source text. Yet one may encounter comments such as *Is this correct?* which would have to be categorised as passive to differentiate them from forms like *Shouldn't this be X?*

5.3   Procedure

All primary data was collected directly from the workplace of the ECB's translation service department in the course of an eight-month period from February to September 2020. The author was able to observe and engage with the Czech principal translators as well as several other-language colleagues.

After consulting the ECB management on a confidentiality regime and the research purposes, a set of archived comments files from the year 2019 or older (at least 2 years old as at the date of submission of this thesis) was retrieved from the ECB intranet and all comments were anonymised. Anonymisation was done directly in MS Word; extracted comments in MS Excel were already anonymised. All CFs had been sorted by type of publication.

In terms of the translation process, several online semi-structured interviews were carried out with MTE senior translators who had recollections of the introduction of CFs and with those who had been assigned with mining of comments.

A sample of CFs for categorization was selected based on the following criteria:

- number of comments per document – publications with less than 10 comments were excluded for more equal representation of all publication types;

- recurrence of issues – highly repetitive CFs were excluded to explore as many aspects of CFs as possible;

- accessibility of translations – priority was given to texts published in a larger number of languages to allow for a better comparison of translation solutions.

The sample comprises ten individual CFs and two compilations of extracted comments. The sample size was 114 comments. During analysis, four comments were found identical in subject matter and were consequently counted as one; they would be also classified as the same type. The same issue and solution concerned an additional couple of comments. Taking this into account, the final number of analysed comments is 110.

All analysed publications in all language versions are freely accessible online either from the website of the Publications Office of the EU or from the ECB's website. The selected documents for quantitative analysis comprise:

- reports of the European Court of Auditors (ECA) of which the analysed sections concern the ECB's reply to the ECA's findings,

- sections of Convergence Reports dealing with the state of economic convergence in general and summary information on the countries Latvia and Sweden,

- Annexes to transmission letters to the ECB Annual Reports.

All comments were evaluated according to the classification design and the overall incidence of features in all categories was calculated in an MS Excel spreadsheet. A type was determined for every comment based on the combination of its characteristic features and the prevalence of different comment types was also calculated.

6   FINDINGS AND DISCUSSION

6.1   Quantitative Analysis

The distribution of features of all categories in the analysed sample is shown in Chart 1. Only the main categories are included, and incidence is given in absolute and relative values. Charts 2, 3, and 4 below indicate that the distribution is comparable in all three publications.
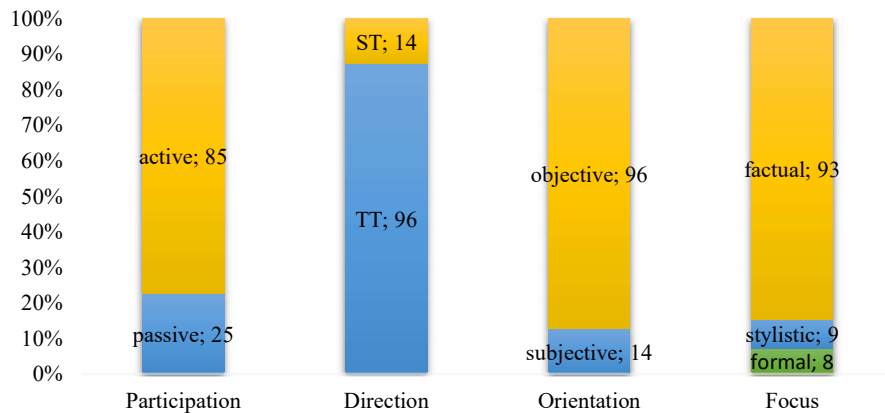
Category distribution
whole sample

Chart 1 Distribution of individual features across all comments
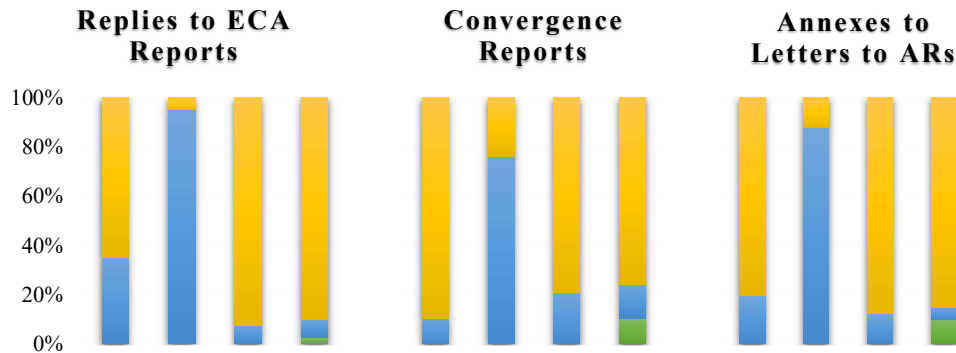

Chart 2, 3, and 4 Category distribution in the three analysed publications

In the category Participation, there was a high prevalence of active comments, suggesting that translators are willing to expend more effort to provide detailed information. The reasoning here is presumably purely pragmatic. The main idea behind the use of comments files is efficiency, so it is not surprising that the translators' main goal should be relevance. Relevance of information – in a pragmatic sense – is the balance between informative value and the processing effort of interpretation (Sperber and Wilson 1994). Therefore, there is a tendency to provide as much information as possible to minimize the processing effort needed on the side of the addressee while maximizing informativity. Contrary to that is the reliance on shared knowledge which allows for a higher degree of implicitness and thus spares effort on the side of the addressor. In terms of relevance, the majority of active comments can be interpreted as an act of prudence. Phrasing a question in as much detail as possible even at the possible cost of being redundant reduces the risk of

misinterpretation which would significantly prolong the path to resolving the translator's query or even make it impossible due to the time constraints involved. An additional explanation is given by the principle of politeness (Leech 1983) according to which there is a general tendency in communication to spare the effort of the other while maximizing one's own.

From the category Direction, it is apparent that within the context of CFs translators are in a weaker position as "those less informed" and thus "in need". Not only is the majority of comments directed at the TT, implying the translator's role of an inquirer, but there is also a marked difference in the form in which editors and translators exert influence (i.e., give directives). Translators refrain from the use of imperatives, and even in comments with ST direction opt for indirect constructions (e.g., *shouldn't this be X?*), which are considered more polite (Leech 1983, 108). Editors, on the other hand, seem to be more direct (e.g., *Can we use X instead of Y? – Please keep Y*; *Can X be used here? – No, it means Y*). In contrast still, even the editors would often adopt an unauthoritative stance and refrain to hedging or other ways of reducing the commitment to their statement, such as in the following example: *I speculate that perhaps we are not talking about….* Note the use of the first-person plural as a stand-in for the institutional voice behind the text.

The majority of issues discussed were objective, matter-of-fact, with only 13% of the comments discussing strategy. As regards those cases, translators asked about strategies in general terms (such as using explicitation or omission) as well as about specific solutions. A limited number of comments comprised queries *and* proposals concerning the author's/editor's procedure. They focused mainly on the usage of terminology and issues of editing. Language-specific problems were also encountered. These were raised in situations where literal translation might have had inappropriate connotations or a condensed English phrase had to be made explicit, so the translators asked for approval of their alternatives. In some cases, the alternations that the translator would not want to make without approval were quite minor, which again brings to the fore the issue of agency. While the translators themselves seem to feel ultimately responsible for their translations (personal correspondence), it could be argued that they are rather liable than responsible. Specifically, translators are the ones who must ensure that the translations are correct, but the notion of quality and its standards are not entirely under their direction. This can be illustrated by an isolated

case of a translator's proposition to add into the text a parenthetical explanation that was directly refused.

> Q: Given that this is for MEPs (not necessarily versed in financial language), and the expression "net purchases" may not be immediately understood, would it be ok in translation to add in brackets "i.e. purchases exceeding redemptions", or something to that effect?
>
> A: Please keep 'net purchase'.

As the rest of the categories, also Focus was dominated by a single feature. The distribution of features including the Reference subcategory is displayed in Chart 5. Ninety-three comments (approximately 85%) were presented in a field-dominated context, that is, their focus was factual. Formal and stylistic focus was represented by comparable groups of eight and nine comments, respectively.

Stylistic issues concerned terminology that is specific to the ECB and thus presents part of its institutional identity. Secondly, comments were aimed at the message of the TT, e.g., whether information should be merely stated, evaluated, or explained. These decisions can be connected to the overall purpose or to genre conventions and argumentative structure. Text types were also considered in connection to connotations and language-specific conventions. It seems to follow from this type of comments that translators proceed from more literal translations to freer wordings if necessary. A similar observation was made on texts from the European Parliament by Mason (2004, 405).

All formally focused comments were at the same time aimed at the ST, indicating that translators solve aspects of sentence length, typography, punctuation etc. independently of CFs. Although this correlation does not hold entirely in the inverse direction. The eight formal comments constitute 57% of all ST directed comments with factual focus on second place (36%).
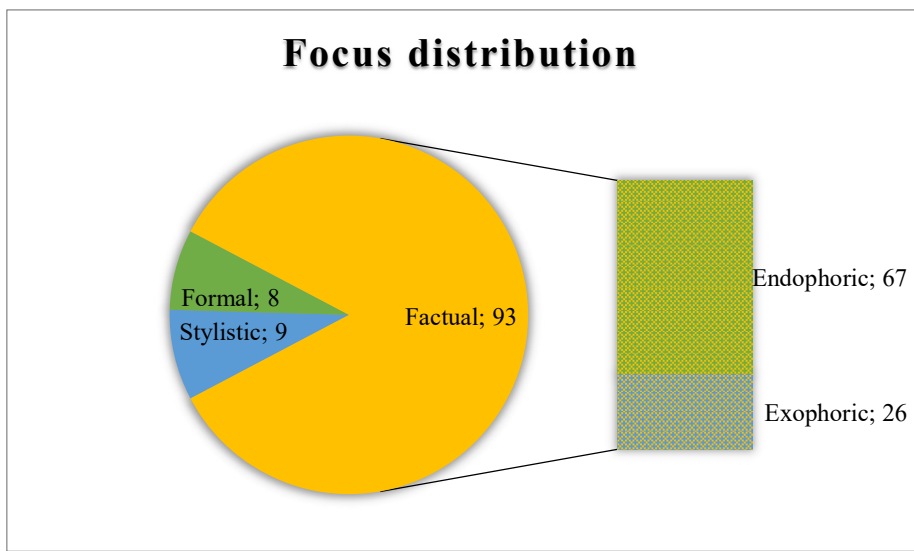
Chart 5 Distribution of the focus of comments including the subcategory Reference

Most factually focused comments (72%) were concerned with speaker meaning, i.e., they were categorized as endophoric. The result is consistent with the view expressed by the interviewed translators – and presented in this thesis – that CFs mainly help resolve ambiguities and clarify implicit meaning that is controlled by the creators of the text.

The proportion of endophoric to exophoric comments was less distinct in one of the analysed publications, namely in the Annexes to Transmission Letters to ECB Annual Reports (20 to 15). While the intentional focus was still prevailing, the number of questions about wider context was relatively high, which corresponds to the nature of the ST. The document constitutes replies of the ECB to the feedback provided by the European Commission on the ECB's Annual Report. Many comments were targeted at sections of the original document containing the EC's feedback, which were classified as contextual (exophoric) information. Curiously, the ECB's Replies to the ECA Reports are virtually the same type of document, yet the distribution of factually focused comments is more unequal. A possible explanation draws on the fact that the comments on Replies to ECA Reports were taken primarily from a set of extracted comments. It could be hypothesised that endophoric comments are more likely to be selected during comments extraction ("mining") because they carry information that can be hardly obtained from another source. Consequently, the percentage of endophoric comments would be higher even if there was a stronger exophoric focus in this type of publication.

The statistics given above present information about categories across all analysed comments. To give a more specific account of individual comments, Chart 6 shows co-occurrences of features classified as comment types. The left pie chart shows the incidence of the four most frequent comment types and the remaining portion occupied by the less frequent types which are individually represented in the right-hand chart. The prevalent four are labelled by noun phrases of the type described above, the remaining are identified by a code that was created by concatenating the values of individual categories. In all, the analysed sample contained 17 comment types of the 32 possible.

The two most frequent types correspond to the illustrative sentences *Does X mean Y?* and *What does X mean?*. In other words, they differ only in the category Participation. This implies that the canonical translation problems that are the alleged main target of CFs were indeed addressed in 56% of cases. The difference in Participation is maintained even in the case of the third most frequent type ("Active query on a factual exophoric subject"; 15%) and its passive counterpart (5%). While the first three share the feature of a factual focus, the fourth most frequent comment type concerns form and can be exemplified by pointing out a misplaced footnote or a mistake in an acronym expansion. The remaining types of comments are distributed quite uniformly, although, given the small sample size, differences might be obscured. The same can be said about the types that were not identified at all.
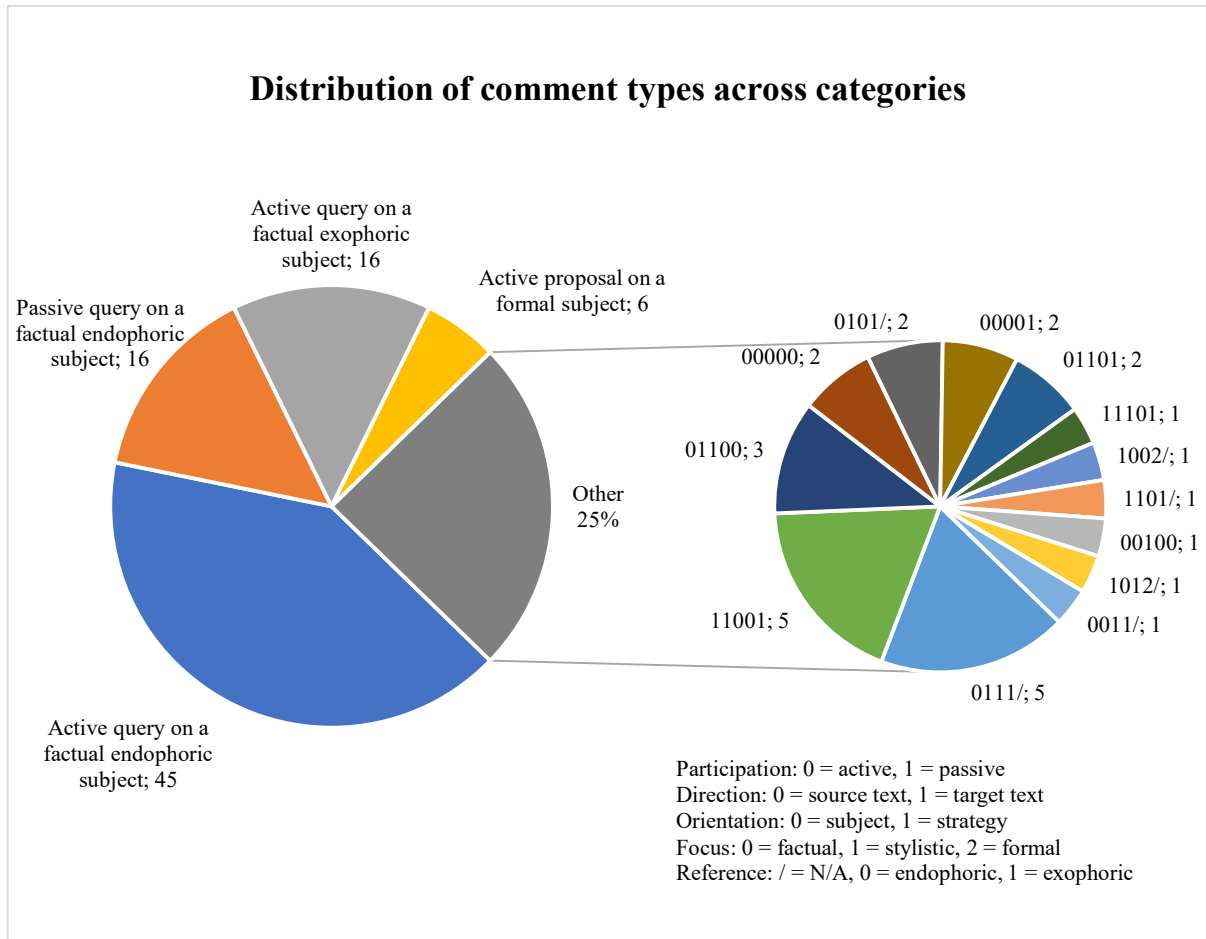
Distribution of comment types across categories

Active query on a factual exophoric subject; 16

Active proposal on a formal subject; 6

Passive query on a factual endophoric subject; 16

0101/; 2

00000; 2

00001; 2

01101; 2

11101; 1

1002/; 1

1101/; 1

00100; 1

1012/; 1

0011/; 1

01100; 3

Other 25%

11001; 5

0111/; 5

Active query on a factual endophoric subject; 45

Participation: 0 = active, 1 = passive
Direction: 0 = source text, 1 = target text
Orientation: 0 = subject, 1 = strategy
Focus: 0 = factual, 1 = stylistic, 2 = formal
Reference: / = N/A, 0 = endophoric, 1 = exophoric

Chart 6 Distribution of comment types as combinations of features

6.2   Qualitative analysis

The discussion within CFs was analysed for the use of metadiscourse. The role of metadiscourse among other things is to facilitate communication (Hyland 2005, 5). Translators as language professionals could be expected to use specialized vocabulary to communicate their message as precisely and accurately as possible. However, the analysis revealed almost no use of linguistic terms, only economic vocabulary given by the overarching theme of the discussion within CFs. The only frequently used linguistic terms, although not very specialised, were "synonym" and "terminology". The more technical term "connotation" was also used, but only rarely.

The medium of CFs is reflected in a specific type of metadiscourse that is probably closest to the use of punctuation which Hyland puts under the category of written non-verbal metadiscourse (2005, 28). On the translators' side, the function of

appending a comment to a specified stretch of text by highlighting it allows for a higher degree of implicitness as well as for a bigger potential for deictic markers. As a result, translators do not need to express what they are referring to in specialised terms and often can get straight to the point. A case of the ultimate comment reduction would be when the translator puts forward only their interpretation to be confirmed or corrected, e.g., the word "distribution" is highlighted, and the comment reads *geographical distribution?*

A counterpart to the implicitness was the frequent use of hedging and politeness expressions that extended the comments. The expressions themselves varied in length. A few examples are *. . ., right?*, *Could you (please). . .?*, *Just to make sure*, *To double check*. These expressions could be classified as illocution markers and expressions of politeness that translators employ to be more indirect, which is an identified principle of politeness (Leech 1983, 108). Hedges were sometimes found in the editor's replies since they are not as informed as the original authors and want to make sure that the translators do not infer from their responses more than they can vouch for. In several cases, an expert's opinion was provided in an additional comment in the next version of the CF.

The analysis identified one further aspect of CFs that has not been taken into account based on observations. The communicative channel is not restricted to comments in the document's margin but encompasses the ST draft as well. Editors use the function Track Changes to show editing that has been done between drafts and would sometimes refer to them in their replies. As a result, editors are able to answer more implicitly, using Track Changes in a similar fashion to how translators use the highlighting of comments.

In one of the CFs, the analysis identified four comments that addressed one and the same issue; these are in the results counted as one. Each of the four was, nonetheless, phrased slightly differently, which suggests that they were made by different translators. They asked about the use of the terms "forecasts" and "projections" in a Convergence Report. It is important to remember that the ECB does fulfil its role independently but not alone (cf. Section 3.1). In particular, the Convergence Report also informs about the actions of the European Commission, and the terms in question may be used distinctly, as used in the EC's and the ECB's publications, respectively. In this case, the authors and editors of the ST use the two interchangeably, but the translators are under the assumption that the distinction is

preserved and warn of a possible terminological error. This shows how the borders between categories of comments are not clear-cut. To the editors, the distinction is merely a question of form. The differences in lexicalization between the perspectives of the addressors and the addressees is also illustrated here. These differences make it a rather endophoric issue since the use of terminology can be in this case hardly verified elsewhere. Furthermore, translators seem to be closer in their reasoning and background knowledge than editors, given that they arrived at the same interpretation seemingly independently. The fact that the same issue was raised in four different sections of the same text raises the question whether translators make use of the option to view questions posed by others. Seemingly, it is the practice of at least some translators as long as there is enough time for the review (personal correspondence 2021). In any case, this example shows that the problem CFs are supposed to solve, that is, the repetitiveness of questions increasing the editors' workload, is not entirely removed.

One instance of an issue that many translators clearly overlooked was found in one of the ECB's replies to an ECA Report. The English draft contains a syntactic ambiguity:

> The Eurosystem <u>accepts</u> CRAs that are registered or <u>certified</u> by ESMA <u>as</u> ECAIs or RTs if the CRAs. . ..

The ambiguity here concerns the dual interpretation of the Predicate and the Object of the first clause. One interpretation is to subsume the Prepositional Phrase (PP) "as ECAIs or RTs under the Predicate, giving the following constituents: "(The Eurosystem) (accepts as ECAIs or RTs) (CRAs that are registered or certified by ESMA)". The other interpretation subsumes the PP under the Object, yielding "(The Eurosystem) (accepts) (CRAs that are registered or certified by ESMA as ECAIs or RTs)". According to the answer provided in the CF, the former interpretation is correct, albeit perhaps less probable. Yet in the five language versions inspected (CZ, SK, PL, FR, DE), only the Polish was translated accordingly. Another similar example concerns an ambiguous noun phrase "Supervisory Board notes". In the context of a reply to an ECA Report, the intended meaning is "notes for the Board written by Joint Supervisory Teams". However, the more readily accessible interpretation would be "written by the Supervisory Board". Again, despite the ambiguity being resolved in the comments, only two (PL, DE) of the five translations reviewed used the suggested

reading. These examples illustrate that issues discussed in comments do get overlooked and – more importantly – that these issues are transferred into the published texts.

One reason the endophoric and exophoric categories are difficult to differentiate is the relatively loose use of reference in the ECB's publications. For instance, consider the following sentence:

> The targeted review of internal models (TRIM) will continue in 2019 with the overarching aim of reducing unwarranted variability of risk-weighted assets and confirming the adequacy of banks' approved Pillar I internal models.

It is only by pragmatic inference that the reader can arrive at the correct interpretation of the underlined phrase. It is used in the context of risk management and refers to "the inconsistencies among ways that banks calculate risk-weighted assets in their internal models". Compare this with another sentence:

> Although the overall impact of the measures is indeed difficult to assess thoroughly, the ECB considered indicators for their success.

In this case, a translator proposes two interpretations and asks which one is correct: "ECB considers them successful based on certain indicators" or "ECB has considered what indicators to use to measure their success". Although only the latter – and correct – version is grammatical, the previous example seems to justify translators' asking even those questions that may at first seem redundant.

One could argue that the two examples are not comparable because in the first case the implicit interpretation is not ungrammatical or incorrect in any sense, and so the comment in the latter case is indeed unnecessary. To defend the uncertain translator, there are two scenarios in which a clarification would be needed. First, unnatural constructions and neologisms are characteristic of the EU texts[14] (Koskinen 2000, 53). Second, during the translation process, the STs themselves are often still in the drafting process, so a translator may encounter a grammatical issue and a comment may lead to a revised version.

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[14] Compare the use of the phrase "in a dialogued fashion" in one of the analysed documents.

Turning back to the first example considering risk-weighted assets, when this passage was compared in several language versions, the following translations were retrieved:

> Czech "nežádoucí" [unwanted], Slovak "neopodstatněnou" [unsubstantiated], Polish "nieuzasadnionych" [unjustified], French "injustifiée" [unjustified], German "unbegründete" [unfounded]

There seems to be a shift in the Czech translation, but more importantly, none of the translators decided to make the rather obscure use of reference explicit. Yet one of the translators found it vague enough to ask for clarification in the CF. This begs the question why make the extra step of asking and then not act upon the answer. It stands to reason that the translators were either too constrained by the emphasis on consistency between language versions to include more extensive changes like explicitation, or the author of the comment was cautious enough to ask in a comment about an interpretation that they (and many other translators) later considered unambiguous even to a less knowledgeable reader.

Another such example concerns an issue of generality in the following sentence:

> Technical design features of the new data centre are comparable to the <u>scope</u> of the European Code of Conduct

According to the editor's response, "comparable to the scope" means more or less in line with the Code's requirements. An inspection of the other language versions shows that translators dealt with this issue differently. Some, such as the Czech, the Slovak, and the Spanish, decided to keep the general term "scope" that might be considered unnatural (at least in Czech). Other versions (French, German, Polish) talk explicitly about "requirements". The second solution, however, seems to be more assertive of the technical compliance than is suggested in the editor's response. Keeping the generality of "scope" could then be interpreted either as ignorance of the issue and its discussion in CFs or a deliberate strategy to preserve the obscurity.

6.3   Prevalent Function of Comments Files

The analysis has shown that comments files serve translators mainly as an aid for disambiguating the ST author's intended meaning concerning the subject matter. A significant number of comments was also an offer of information to the ST drafters

from translators, where the focus was mostly on the form. This finding supports the idea of interactivity and nonlinearity of the translation process.

As regards the prescriptiveness of comments files, they are not seen as a formal part of the QA framework, neither are they perceived as decisive in comparison to other guides or instructions. At present, CFs seem to have the same position in the translation process as the unorganized communication they replaced. In other words, their use by translators remains optional, and obligatory instructions are given by other means, such as via direct email communication. The results of the comparative analysis show that translators do not always incorporate the proposed solutions into their final translations, which also points to the described status of CFs.

In a similar fashion, the analysed CFs did not address the effect on the reader (in this thesis categorised as stylistic focus) to the degree that was expected. Based on personal observations in the MTE3 department, the impression that texts make on target readers is deemed important and translators are acutely aware of the ramifications in the case of misinterpretation on an interpersonal level, that is, if a text sets the wrong tone, for instance. While the results might be influenced by the selection of texts – more politically laden texts, such as press conferences, were not included – another explanation would be that translators prefer to deal with these questions on their own or between themselves as opposed to consulting them with editors.

Another important function of CFs lies in coordinating the views of translation participants and thus preventing deviations between individual language versions when strategies are applied differently. The present thesis did not find evidence of CFs being used in this way in the ECB. Arguably, coordination is not achieved unless translators review all comments; not just those they posed themselves, in which case CFs would only streamline communication between translators and editors. To ensure the coordinating function of CFs, it may be necessary to adopt an overall quality management framework – perhaps the one implemented by DGT – that would specify the goals and working practices related to CFs.

Leaving that aside, it has also been shown that the ECB's translation service is a dynamic and rapidly developing workplace. For that reason, the idea of changes in workflow and in the overall role of CFs should not be left unconsidered. Furthermore, considering that the present thesis is only a micro-scale study, it is possible that the concept of CFs was not covered in its totality. Consequently, there is a number of

possible developments and theoretical implications that will be discussed in the following sections.

6.4   Potential Use of Comment Files

6.4.1   Integrating comments files into a CAT tool

The translation environment in the EU institutions shares several features with the modern localization industry, namely the internationalization of STs and multiple TTs with a purportedly equal authenticity (for further theoretical comparison, see Pym 2004b). Although the conditions of free-market localization are far from those of a supranational political entity, it is often the case that seemingly inappropriate comparisons inspire beneficial innovations. Specifically, I believe the EU translation services might benefit from some aspects offered by the technological tools commonly used for localization[15]. Such CAT tools are for example Smartling or Lokalise. Their eponymous companies are both relatively new but growing in popularity. Their services comprise a comprehensive translation and localisation interface for translators as well as project managers. Having a shared platform for various agents in the translation process apart from translators is one aspect that could enhance coordination and result in a more consolidated institutional voice. Moreover, using a single IT solution might improve the accessibility to CFs for other parties. In the case of freelancers, their detachment from the quality policy suggests lower job satisfaction (Drugan, Strandvik, and Vuorinen 2018, 63). Due to the recent expansion of teleworking and work-from-home arrangements and the wider and long-standing trend of service outsourcing (ibid., 64), there is a growing importance of communication and interconnectedness.

A more specific, but all the more so notable feature is the integrated project chat in Lokalise. It is a similar concept to comments files, and it is directly accessible from the online CAT tool. With direct access from the translation interface, making comments and asking questions is more ergonomic for the translators. Moreover, other project contributors, such as managers, proofreaders, or software developers may access the project chat without interfering with each other's actions. In the EU context,

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[15] Based on personal experience and observation.

this feature would remove the requirement of submitting comments in phases since editors could view and answer comments "on the go". In addition, translators and editors could set up notifications for particular projects so that communication delays are eliminated. It would still be useful to set deadlines for submitting comments and answers, yet the process would be more flexible.

Another useful feature from Lokalise is the multilingual view. When toggled, the STs segments are aligned with target segments in multiple language versions. The same function is used in the ECB's customised Trados Studio, but the process of viewing other language .sdlxliff files is protracted and the function is faulty (personal observation 2020).

As illustrated, the integration of CFs into the translation interface is only one of the possibly many perks of using a comprehensive cloud-based platform. Nonetheless, even the project chat feature as a substitute for CFs could be further optimised. Therefore, several suggestions for more efficient and productive use of the concept of CFs are provided below.

6.4.2   Optimising discussion in comments files

It has been shown that the function of CFs in achieving consistency and streamlining workflow is indispensable. However, the form in which CFs are currently used is rather crude and not tailored to the needs of the translation service.

Apart from the ways of improving the ergonomics and efficiency of CFs mentioned above, it would be certainly beneficial to establish basic principles for phrasing and/or labelling comments. A similar categorization of comments to that presented here could serve as a basis for a coding system or a template for adding comments that would provide translators with a quick and easy way of expressing their queries/proposals. For editors, this system would facilitate interpreting comments and prevent misunderstandings. Classification by the type of issue would allow having extracted comments more organised for future use.

Furthermore, CFs could be supplemented with an inventory of flags, such as "relevant to other language versions" or more generally "severity/importance" of a comment, indicating to other translators whether they should view the comments even if they had no problems with the section concerned. Translators themselves might use the flags to mark either factual mistakes, risks of misinterpretation in the ST (high

severity) or, for example, stylistic suggestions and minor typos (low severity). Both parties could then make use of a filtering feature to address comments in accordance with their time capacity: preferentially high severity issues to be dealt with before the project deadline and low severity perhaps retrospectively, e.g., in the process of comment mining. This would not only make the workflow more organised but also create space for discussion of less pressing issues that have potential implications for the future.

The utility of CFs would be enhanced by establishing a routine retrospective analysis of extracted comments as part of the assessment of the translation process from a quality perspective. For example, if a recurring issue was identified, relevant style guides, terminological information or other translation guidelines could be updated accordingly. Owing to the categorization/labelling of comments, such analysis could be also performed quantitatively on a large dataset to investigate potential trends.

Comments files should not be seen merely as a medium for answering translators' questions. There is considerable potential for source text improvement since as much as a third of all comments may lead to corrections or new versions (Drugan, Strandvik, and Vuorinen 2018, 56). Furthermore, CFs allow translators to become more involved in the drafting process where high interactivity is advisable given the fusion of translation and drafting that is characteristic of EU translation services. Another challenge that finds a possible solution in CFs is posed by the multicultural backgrounds of individual translators. Factors like the history of Translation Studies as a discipline, training institutions, and stylistic conventions in different countries all affect how especially novice translators view and perform their work. These aspects complicate the efforts for a consistent quality framework (Drugan, Strandvik, and Vuorinen 2018, 61). Extending the scope of discussion in CFs and encouraging translators to share their reasoning on specific translation problems might help harmonise their views of their practice. Archived discussions can then be reviewed by quality managers, and the quality framework would be adjusted accordingly. For these reasons, the discussion in CFs should be broadened, and a system of flags/labels would arguably allow it.

If the ECB were to start appointing quality managers in parallel to the DGT (Strandvik 2017a, 57), CFs could be used to assess the usability of reference materials and remedy the situation in case materials were not being used; something that has been pointed out by past studies on the DGT (Svoboda 2017, 76). If the analysis of

CFs found that translators raise questions despite having the answers accessible in reference materials, it would indicate that perhaps the structuring of these materials should be improved. In their work with CFs, both translators and editors would benefit from a standardised organization of guides and other materials so that these can be referenced analogously for all languages. Currently, there seems to be no such convention (Svoboda 2017, 103). It is important though to bear in mind that full standardisation of the translation process may be to the detriment of efficiency (Drugan, Strandvik, and Vuorinen 2018, 56), so a degree of flexibility must be preserved.

6.5   Suggestions for Further Research

6.5.1   Comments files as a methodological tool

Comments files provide insights into the inner processes that shape EU texts and as such have the potential to supplement findings of critical discourse analysis. Especially the analysis of political texts such as press releases and official statements might benefit from observations of the drafting process and the accompanying discussion. The present thesis could not focus on such analysis due to the confidentiality restrictions related to the potentially sensitive information contained in CFs on politically laden topics. This proved to be an obstacle for a short-spanned traineeship but should not be non-negotiable in the context of larger-scale research.

An analysis of CFs as a variety of paratexts can also be incorporated into the methodology of Descriptive Translation Studies where it could reveal the effects of translation norms (Toury 2012, 83).

Comments files may also serve as a proxy for studying workplace discourse. To identify whether the discussion via comments follows specific rules or conventions – whether it constitutes a specific genre – a corpus of comments could be compared with a corpus of the underlying STs. This method would also allow for a comparison between the official institutional discourse presented in the STs and the style of communication between translation participants. Alternatively, after filtering out the factual elements of comments – which would be those shared with the STs – the true characteristics of comments, including the use of metadiscourse or discourse markers – could be then compared to other workplace registers, such as minutes from meetings or work conversations. This kind of studies might produce findings on the diversity of

in-house discourse and its connections to the way the institution presents itself to the outside world. Moreover, such research would enhance the understanding of the highly functionally oriented communication that takes place via CFs, which would in turn inform any efforts for workflow optimisation.

Related to workplace discourse is the area of research focused on English as a *lingua franca*. By convention – also due to English being used as a source language – the discussion via comments files takes place in English. This has potentially significant implications on the translation solutions approved in comments files and employed by other translators. For this reason, it would be reasonable to gather findings of previous research on ELF when developing a framework for comments files as part of quality management. ELF researchers, on the other hand, may find comments files a useful tool for studying the influence of ELF on discourse. While House did not find significant effects of English on native discourse practices (2003, 574), interference may be amplified by the presence of English in form of the source text being discussed.

6.5.2   Comments files as a research object

The present thesis outlines the function of CFs and their place in the translation process but does not account for all possible factors and variables. For a comprehensive understanding of the concept, several areas of investigation are proposed below.

Based on the studied environment, CFs are employed in a specifically multicultural environment. Contrastively, CFs mediate communication exclusively in English. Considering that the general subject of CFs is translation, language is undoubtedly a relevant aspect. It would be worth exploring whether the discussion in CFs can lead to different outcomes in different language versions, and if so, how these differences correlate with the respective linguistic and cultural contexts. A correlation may be identified with the characteristics of eurolects, Hypothetically, the interferences caused by the Anglo-centric Eurospeak that are found in other European languages are perpetuated, if not amplified, by the use of English in secondary communication, including CFs.

A larger-scale study adopting the methodology devised in the present thesis would further specify the function of CFs. In addition, focusing on what could be

resolved in them but normally is not discussed might identify an unfulfilled potential or unveil inner power dynamics that prevent discussion of certain subjects.

A more specific study would consider the distribution of comment categories by type of publication.

Differences in Participation could be studied diachronically to see whether the discourse of CFs evolves as the participants get accustomed to their use. Comments would presumably get more implicit as translators learn about the overlaps and differences in background knowledge between them and the editors. In contrast, publications dealing with uncommon, new, or generally complex topics would probably lead to more explicit expressions.

Both differences in background knowledge and the translators' perception of their area of expertise could be reflected in the category Direction. A higher proportion of source text-oriented comments (i.e., proposals) might signal either the translators' different views on the topic related to their perceived area of expertise or frequent deficiencies in the ST that might require a re-evaluation of the drafting process; whether the former or the latter is the case would depend on the comments' focus.

Considering the Orientation of comments, further research may uncover areas where translators are perhaps less certain, or where they feel constrained by and/or dissociated from the institutional voice. In such cases, more strategic comments would be expected. Language-specific differences may also lead to a higher incidence of subjective/strategic comments from translators of a given language. Their comments would be presumably pointing out that *in language X, Y cannot be translated literally,* and a shift of meaning is unavoidable. They might, therefore, ask whether one or another solution is more appropriate.

In the category Focus, political texts – where a higher prevalence of stylistic focus is expected – would be presumably of most interest. If this expectation were not to be confirmed, it would be valuable to find the reason why interpersonal meaning escapes formal discussion.

Translators in EU institutions have an abundant supply of guides and reference materials. The adherence to recommended procedures in translation products, however, remains to be investigated (Svoboda 2017, 102). In carrying out such a study, CFs could be included in the analysis to assess their position among other translation guidelines and see whether their intended prescriptive power corresponds to the degree

of compliance. As has been shown in the present thesis, CFs are perceived as an optional tool and proposed solutions are not always implemented.

7   CONCLUSION

The present thesis investigated the translation process in one of the EU institutions, the European Central Bank. In particular, the topics of quality, norms, and agency were considered. Regarding quality, it has been argued that a consistent approach to translation across the EU institutions is desirable to maintain the EU-wide values and ideas, such as the equality of languages or, more recently, the emphasis on clarity. From a broad perspective, this is partly achieved under the common institutional style set out in the *Interinstitutional Style Guide*. More specific to translation, the current state of quality management in the EU institutions is spearheaded by the DGT of the European Commission, and similarities in approach were identified in the case of the ECB, suggesting that the DGT's framework may serve as a foundation for other translation services.

It seems that only the DGT has implemented a matrix of processes and roles; in the ECB, quality management is only partially structured. However, neither studies of guidelines (cf. Svoboda 2017) nor papers on the DGT's quality management (e.g., Drugan, Strandvik, and Vuorinen 2018) have paid considerable attention to comments files. Utilization of CFs and continuous workflow improvements contribute to process optimisation and better knowledge management; two basic principles of quality management (Strandvik 2017a, 55). Accordingly, it was hypothesised that CFs fulfil two essential roles: i. streamlining communication between different agents in the translation process, thus increasing efficiency, and ii. coordinating textual interpretations between translators of different language versions and by extension their mental representations of institutional norms. Only the former found support in empirical data.

Nonetheless, it is the latter function that makes CFs particularly suitable for the environment of EU institutions. During communication, in the hermeneutic sense of cooperative meaning-making, different conceptualizations of reality resulting from different cultural and linguistic backgrounds of individuals may cause shifts in meaning despite the shared working language. Arguably, this issue may arise in all communication. Even so, the multilingual and multicultural environment of EU

institutions nothing but supports it. Adding to the mix the combined authorship of STs creates a considerable space for misinterpretation and high demands for disambiguation on the side of translators (cf. Pym 2004a).

Considering agency, comments files represent the characteristically cooperative nature of the institutional translation process. There is no strict hierarchy in authority over the texts, and the power structure seems to be determined by the archetypal comment that seeks to clarify implicit information which is primarily volitional (i.e., speaker meaning). Participants of the discussion choose their contribution in accordance with their perceived area of expertise. For instance, while translators do consult their colleagues from different language units (personal correspondence 2020), CFs show no direct exchange of information between translators, or in other words, translators do not answer questions in comments. This is either because such interaction does not fit the perceived purpose of CFs or because translators are not in the position to answer. In the latter case, it is the editors who have higher authority, although they are not necessarily more competent to answer.

In this regard, comments files are a less suitable medium for an open discussion, which might enhance the overall coordination of translation agents that seems to be sometimes lacking. For this purpose, then, CFs could be helpful in a retrospective analysis to see what issues come up the most and to deal with those in a separate way, perhaps in a quality management meeting.

The present findings from the ECB setting seem to corroborate the view of equivalence as linguistic correspondence that was ostensibly adopted from legal translation (Koskinen 2000, 55). To give way to the currently favoured principle of fitness-for-purpose, translators should be encouraged to employ freer, more idiomatic solutions depending on text type. At the same time, permissible translation shifts should be discussed at a more specific level to preserve an appropriate degree of consistency between language versions. Such discussion could be well included in CFs if their intended purpose were to be expanded and their new function integrated into a formal quality framework. To enhance the workflow related to CFs, several suggestions were made, including migration to the cloud, integration into a CAT tool, and giving comments a slightly more rigid structure.

In sum, comments files are a possibly underdeveloped concept in institutional translation that has the potential to provide a more comprehensive, unified picture of the translation process, be it from the academic point of view or a practical perspective.

Comments files provide a window into the study of significant variables that shape the translation environment in the EU institutions, such as the conceptualization of translation quality, agency in the translation process, and institutional norms of translation. Larger-scale research is advisable to confirm the identified status of CFs or to track potential developments of the concept in the studied institutions. Alternatively, further studies could elucidate the situation in other kinds of translating institutions: whether and under what conditions CFs are employed, if they are employed in the same manner, and if not, what other means are utilized in their stead. Once a theoretical foundation for the concept of CFs is established for multiple types of translating institutions, other researchers may implement them into their methodology in areas like workplace discourse, ELF, or genre theory.

8 RESUMÉ

Současný profesní svět se vyznačuje trendy, jako je globalizace či automatizace, které kladou vysoké nároky na produktivitu a efektivitu práce. Takové prostředí dává institucím s dělbou a organizací práce výhodu nad jednotlivci, a lze tedy očekávat, že za stávajících podmínek bude institucionalizace pronikat do dalších a dalších odvětví, překladatelství nevyjímaje. Aby však upřednostňování efektivity nebylo na úkor kvality, je třeba bedlivě sledovat, jaký má současný vývoj dopad na překlad v praxi. V posledních letech bylo zdůrazňováno, že ke studiu překladu v institucionálním prostředí je zapotřebí detailních případových studií z jednotlivých institucí, jelikož se jedná o rychle se vyvíjející a relativně neprobádanou oblast (viz např. Koskinen 2010b). Autorovi práce byla poskytnuta příležitost nahlédnout takřka do epicentra dění v podobě překladatelské stáže na generálním ředitelství pro komunikaci Evropské centrální banky (ECB). Tato diplomová práce je tedy pojata jako případová studie zabývající se překladatelským procesem v této instituci.

Studie se zaměřuje na konkrétní aspekt překladatelského procesu, kterým je koncept souboru s komentáři (angl. „comments files“; „CF“). Jedná se o dokument, který je do procesu zařazen, aby usnadnil komunikaci překladatelů s editory či případně autory zdrojového textu v případech, kdy je některé pasáže třeba vyjasnit nebo konzultovat. Studie si klade za cíl prozkoumat ze dvou hledisek, jakou roli v překladatelském procesu tento typ dokumentu hraje.

Prvním hlediskem je oblast řízení kvality překladu, kam spadá zajišťování kvality (Quality Assurance), kontrola kvality (Quality Control) a hodnocení kvality (Quality Assessment). V těchto dílčích oblastech se studie ptá, jakým způsobem a do jaké míry napomáhají soubory s komentáři dosáhnout požadovaného standardu kvality, dále zda jsou CF vnímány jako součást formálního rámce kvality, zda se k nim přihlíží v průběhu revize či jiného procesu QC a zda nějakým způsobem ovlivňují ohodnocování překladů.

Druhým hlediskem jsou překladatelské normy, jež jsou zkoumány zejména jako dokumentované pracovní postupy, jejichž závaznost se liší od doporučení po striktní pravidla. V úvahu se berou také normy ve smyslu chování, které se považuje za obvyklé či samozřejmé, jelikož i ty se do výsledného překladu promítají (Toury 2012), navíc se mohou různit v závislosti na sociokulturním a jazykovém zázemí. Z hlediska norem se studie zaměřuje na pojem aktérství čili jednání (*agency*), jež má původ

v sociologii, a ptá se, zda mají CF normativní charakter pravidel a omezují tak jednání překladatelů, či zda naopak zviditelňují jejich postavení v textotvorném procesu.

V teoretické části práce jsou dvě zmíněná hlediska uvedena v kontextu dosavadních empirických poznatků, jakož i teoretických pojednání o institucionálním překladu. V této souvislosti je také vzpomenut interdisciplinární charakter překladatelských studií, v jehož důsledku některým základním pojmům, jako například *instituce, kultura*, schází obecně uznávaná definice, a je tedy nutné je upřesnit. Zbývající podkapitoly teoretické části se věnují překladu v institucích EU a jejich vztahu k teorii překladu. Prostředí Evropské unie je charakteristické nejen mírou institucionalizace, ale také tím, že je v něm souběžně zastupována řada jazyků a kultur, jež jsou považovány za rovnocenné. Toto specifikum vyplývá z politiky mnohojazyčnosti, která je jedním ze zákládajících principů EU (*EEC Council Regulation No. 1* 1958). Aby bylo možné na toto prostředí aplikovat teorii překladu, je nutné přehodnotit chápání zcela základních, ačkoli mnohdy problematických pojmů translatologie, jako je *ekvivalence*, *zdrojový a cílový text*, *původce textu* či *kulturní kontext*. Právě proto je v oblasti výzkumu institucionálního překladu prosazován metodologický partikularismus.

Východiskem praktické části práce je podrobný popis zkoumané instituce, počínaje funkcí, jež ECB zastává v rámci EU, a konče dokumenty, které upravují styl jejích oficiálních publikací. Popsány jsou též jednotlivé texty, které se v ECB překládají, dále samotné překladatelské oddělení a jeho organizace a konečně překladatelský proces ilustrován na průběhu typického překladatelského projektu. Stěžejními kapitolami jsou podrobná pojednání o CF jednak z pohledu překladatele, které se opírá o pozorování a neformální rozhovory z období stráveného na překladatelském oddělení ECB, jednak z teoretického pohledu analýzy registru a nahlížení na CF jako na druh paratextu. Závěry těchto pojednání posloužily jako základ pro empirický výzkum.

Pro potřeby výzkumu byla z ECB získána sada CF, které byly použity v předchozích překladatelských projektech. Jednotlivé CF byly buďto ve formátu zdrojového textu s vloženými komentáři, nebo ve formě tabulkového kompilátu extrahovaných komentářů. V první fázi výzkumu byla provedena heuristická analýza jazykových prostředků a diskurzu. Komentáře byly zkoumány jednotlivě i v párech typu otázka–odpověď. V několika případech byla analýza doplněna o srovnání několika jazykových verzí, tj. překladů, zdrojového textu. Účelem bylo zjistit, zda

a jak se diskuse v rámci CF projevuje na výsledném překladu daného úseku textu. Na základě výsledků prvotní analýzy byla sestavena kategorizace komentářů, podle níž byl následně roztříděn vzorek 110 komentářů. Záměrem bylo kvalitativně vyjádřit hlavní charakteristiky komentářů a kvantitativně zobrazit jejich relativní váhu.

Bylo rozpoznáno 11 základních charakteristik, jež byly rozděleny do čtyř kategorií a jedné podkategorie. Tři kategorie a jediná podkategorie obsahují komplementární dvojice charakteristik. Zbývající kategorie obsahuje tři charakteristiky, u nichž se určovala jedna dominantní. V každé kategorii se ukázalo, že výskyt jedné charakteristiky značně převyšuje nad druhou (či nad ostatními v případě poslední kategorie). Méně zastoupené charakteristiky však vypovídají o významných funkcích CF, jež se tedy jeví jako dostatečně nevyužívané. Klíčovým zjištěním bylo, že v několika případech se překladatelská řešení, ke kterým se dospělo v CF, nedostala do výsledných překladů. Na kladené otázky poskytl výzkum následující odpovědi:

a) v otázkách kvality – CF napomáhají kvalitě překladů zejména řešením nejednoznačností ve zdrojovém textu; CF nejsou vnímány jako součást formálního rámce kvality, který je *notabene* v ECB dosud neúplný; CF jsou využívány při revizi překladů, avšak ne vždy a jejich použití není vyžadováno; hodnocení kvality překladu se uplatňuje pouze u externích překladatelů, kteří často nemají k CF přístup;

b) v otázkách norem – CF mají charakter doporučení a jejich používání překladateli není vyžadováno a zřejmě ani kontrolováno; CF umožňují překladatelům podílet se na textotvorném procesu prostřednictvím připomínek ke zdrojovému textu, ovšem téměř výhradně k formě, nikoli obsahu.

Tato práce zaujímá etnografický přístup k překladu. Jinými slovy tato práce bere v potaz skutečnost, že dosažení smysluplných výsledků je podmíněno zasazením detailních poznatků do širšího kontextu. Nesnaží se tedy dělat jakékoli obecné závěry ani ze svých zjištění vyvozovat důsledky. Naopak nabádá k dalším studiím a na základě dosažených výsledků předkládá oblasti, které by mohly obohatit současné vědecké poznání. Poznatky z výzkumu v této práci souhrnně naznačují, že CF nejenže mají své opodstatnění v překladatelském procesu, nýbrž dokonce není plně využíván jejich potenciál. Výstupem práce jsou tedy praktické návrhy na pracovní postupy, které

by mohly funkci CF umocnit a práci s nimi zefektivnit. Kromě toho práce navrhuje využití CF jako prismatu pro nahlížení problematiky institucionálního překladu v EU, jakož i sousedních výzkumných oblastí, jako je kritická analýza diskurzu, teorie žánrů či angličtina jako *lingua franca*.

9 WORKS CITED

Theoretical resources:

Athanassiou, Phoebus. 2006. "The Application of Multilingualism in the European Union Context." SSRN Scholarly Paper ID 886048. Rochester, NY: Social Science Research Network. https://papers.ssrn.com/abstract=886048.

Bezuidenhout, A. 2009. "Semantics-Pragmatics Boundary." In *Concise Encyclopedia of Pragmatics*, edited by Jacob L. Mey, 2. ed, 913–20. Amsterdam Heidelberg: Elsevier.

Biber, Douglas, and Susan Conrad. 2009. *Register, Genre, and Style*. Cambridge: Cambridge University Press. http://search.ebscohost.com/login.aspx?direct=true&scope=site&db=nlebk&AN=304421.

Biel, Lucja. 2011. "Training Translators or Translation Service Providers? EN 15038:2006 Standard of Translation Services and Its Training Implications." *The Journal of Specialised Translation* 16: 61–76.

———. 2019. "Theoretical and Methodological Challenges in Researching EU Legal Translation." In *Legal Translation. Current Issues and Challenges in Research, Methods and Applications*, edited by Ingrid Simonnæs and Marita Kritiansen, 25–39. Berlin: Frank and Timme.

Bini Smaghi, Lorenzo, and Daniel Gros. 2001. *Is the ECB Sufficiently Accountable and Transparent?* CEPS Working Document 169. Brussels: CEPS.

Bora, Alfons, and Heiko Hausendorf. 2006. "Communicating Citizenship and Social Positioning: Theoretical Concepts." In *Discourse Approaches to Politics, Society and Culture*, edited by Heiko Hausendorf and Alfons Bora, 19:23–49. Amsterdam: John Benjamins Publishing Company. https://doi.org/10.1075/dapsac.19.04bor.

Calzada Pérez, María. 2001. "A Three-Level Methodology for Descriptive-Explanatory Translation Studies." *Target. International Journal of Translation Studies* 13 (2): 203–39. https://doi.org/10.1075/target.13.2.02cal.

Chesterman, Andrew. 1993. "From 'Is' to 'Ought': Laws, Norms and Strategies in Translation Studies." *Target. International Journal of Translation Studies* 5 (1): 1–20. https://doi.org/10.1075/target.5.1.02che.

———. 1997. *Memes of Translation: The Spread of Ideas in Translation Theory*. *Btl.22*. Amsterdam: John Benjamins Publishing Company. https://benjamins.com/catalog/btl.22.

———. 2005. "Consilience in Translation Studies." *Revista Canaria de Estudios Ingleses* 51 (November): 19–32.

Constantinou, Maria. 2020. "EU Lay Communication in Translation: Mediation, Affectivity and EU Citizenship: A Contrastive Multilingual Critical Discourse Analytic Approach to Translation." *Perspectives* 28 (2): 202–23. https://doi.org/10.1080/0907676X.2019.1663890.

Drugan, Joanna, Ingemar Strandvik, and Erkka Vuorinen. 2018. "Translation Quality, Quality Management and Agency: Principles and Practice in the European Union Institutions." In *Translation Quality Assessment: From Principles to Practice*, edited by Joss Moorkens, Sheila Castilho, Federico Gaspari, and Stephen Doherty, 1:39–68. Machine Translation: Technologies and Applications. Cham: Springer International Publishing. https://doi.org/10.1007/978-3-319-91241-7.

"Ekonomický Bulletin ECB - Česká Národní Banka." n.d. Accessed July 7, 2021. https://www.cnb.cz/cs/o_cnb/mezinarodni-vztahy/ecb-a-escb/ekonomicky-bulletin-ecb/index.html.

Flynn, Peter. 2010. "Ethnographic Approaches." In *Handbook of Translation Studies*, edited by Yves Gambier and Luc van Doorslaer, 116–19. Amsterdam; Philadelphia: John Benjamins Pub. Co.

Genette, Gérard. 1997. *Paratexts: Thresholds of Interpretation*. Literature, Culture, Theory 20. Cambridge: Cambridge University Press.

Grbić, Nadja. 2008. "Constructing Interpreting Quality." *Interpreting. International Journal of Research and Practice in Interpreting* 10 (2): 232–57. https://doi.org/10.1075/intp.10.2.04grb.

Green, K. 2009. "Deixis and Anaphora." In *Concise Encyclopedia of Pragmatics*, edited by Jacob L. Mey, 2. ed, 178–81. Amsterdam Heidelberg: Elsevier.

Halliday, M. A. K., and Christian M. I. M. Matthiessen. 2014. *Halliday's Introduction to Functional Grammar*. Fourth Edition. Milton Park, Abingdon, Oxon: Routledge.

Hanzl, Jan, and John Beaver. 2017. "Quality Assurance At The Council Of The EU's Translation Service." In *Quality Aspects in Institutional Translation*, edited by

Tomáš Svoboda, Łucja Biel, and Krzysztof Łoboda, 139–54. Berlin: Language Science Press. https://doi.org/10.5281/ZENODO.1048196.

Hendl, Jan. 1997. *Úvod do kvalitativního výzkumu*. Praha: Karolinum.

Holmes, Douglas R. 2019. "Markets Are a Function of Language: Notes on a Narrative Economics." *Economics Discussion Papers* 2019–18. http://www.economics-ejournal.org/economics/discussionpapers/2019-18.

Holz-Mänttäri, Justa. 1984. *Translatorisches Handeln: Theorie und Methode*. Academia Scientiarum Fennica. Helsinki: Suomalainen Tiedeakatemia.

House, Juliane. 1997. *Translation Quality Assessment: A Model Revisited*. Tübinger Beiträge zur Linguistik. Tübingen: G. Narr. http://catalog.hathitrust.org/api/volumes/oclc/36820951.html.

———. 2003. "English as a Lingua Franca: A Threat to Multilingualism?" *Journal of Sociolinguistics* 7 (4): 556–78. https://doi.org/10.1111/j.1467-9841.2003.00242.x.

———. 2015. *Translation Quality Assessment: Past and Present*. Abingdon, Oxon, England; New York: Routledge.

Hyland, Ken. 2005. *Metadiscourse: Exploring Interaction in Writing*. Continuum Discourse Series. London; New York: Continuum.

International Organization for Standardization. 2015. *ISO 17100: Translation Services: Requirements for Translation Services*. Geneva: International Organization for Standardization.

Kang, Ji-Hae. 2007. "Recontextualization of News Discourse: A Case Study of Translation of News Discourse on North Korea." *The Translator* 13 (2): 219–42. https://doi.org/10.1080/13556509.2007.10799239.

———. 2011. "Institutional Translation." In *Routledge Encyclopedia of Translation Studies*, edited by Mona Baker and Gabriela Saldanha, Second edition, published in paperback, 141–45. London New York: Routledge, Taylor & Francis Group.

———. 2012. "Translating Mad Cow Disease: A Case Study of Subtitling for a Television News Magazine." *Meta* 57 (2): 439–63. https://doi.org/10.7202/1013955ar.

———. 2014. "Institutions Translated: Discourse, Identity and Power in Institutional Mediation." *Perspectives* 22 (4): 469–78. https://doi.org/10.1080/0907676X.2014.948892.

King, Brian W. 2018. "Communities of Practice." In *The Routledge Handbook of Language in the Workplace*, edited by Bernadette Vine, 101–11. Routledge Handbooks in Applied Linguistics. New York: Routledge/Taylor & Francis Group.

Kinnunen, Tuija, and Kaisa Koskinen, eds. 2010. *Translators' Agency*. Translation and Culture, B 4. Tampere: Tampere University Press.

Koskinen, Kaisa. 2000. "Institutional Illusions: Translating in the EU Commission." *The Translator* 6 (1): 49–65. https://doi.org/10.1080/13556509.2000.10799055.

———. 2001. "How to Research EU Translation?" *Perspectives* 9 (4): 293–300. https://doi.org/10.1080/0907676X.2001.9961425.

———. 2004. "Shared Culture?: Reflections on Recent Trends in Translation Studies." *Target. International Journal of Translation Studies* 16 (1): 143–56. https://doi.org/10.1075/target.16.1.09kos.

———. 2008. *Translating Institutions: An Ethnographic Study of EU Translation*. Manchester, UK: St. Jerome Pub.; Kinderhook, NY: InTrans Publications.

———. 2010a. "Agency and Causality: Towards Explaining by Mechanisms in Translation Studies." In *Translators' Agency*, edited by Tuija Kinnunen and Kaisa Koskinen, 165–87. Translation and Culture, B 4. Tampere: Tampere University Press.

———. 2010b. "Institutional Translation." In *Handbook of Translation Studies*, edited by Yves Gambier and Luc van Doorslaer, 2:54–60. Amsterdam; Philadelphia: John Benjamins Pub. Co.

———. 2010c. "On EU Communication 2.0: Using Social Media to Attain Affective Citizenship." In *Text and Context: Essays on Translation & Interpreting in Honour of Ian Mason*, by Mona Baker, Maeve Olohan, and María Calzada Pérez, 1st ed., 128–46. London: Routledge. http://site.ebrary.com/id/10857993.

———. 2010d. "What Matters to Translation Studies?: On the Role of Public Translation Studies." In *Benjamins Translation Library*, edited by Daniel Gile, Gyde Hansen, and Nike K. Pokorn, 88:15–26. Amsterdam: John Benjamins Publishing Company. https://doi.org/10.1075/btl.88.03kos.

———. 2014. "Institutional Translation: The Art of Government by Translation." *Perspectives* 22 (4): 479–92. https://doi.org/10.1080/0907676X.2014.948887.

Leech, Geoffrey N. 1983. *The Principles of Pragmatics*. London: Longman.

Loedel, Peter H. 2002. "The European Central Bank: Exploring Institutional Independence and the Need for Reform." In *Institutional Challenges in the European Union*, by Madeleine Hösli, Ad M. A. van Deemen, and Mika Widgrén, 201–26. London; New York: Routledge. http://www.myilibrary.com?id=2604.

Mason, Ian. 2004. "Text Parameters in Translation: Transitivity and Institutional Cultures." In *The Translation Studies Reader*, edited by Lawrence Venuti, 2nd ed., 470–81. London and New York: Routledge.

Mossop, Brian. 1988. "Translating institutions: a missing factor in translation theory." *TTR : traduction, terminologie, rédaction* 1 (2): 65–71. https://doi.org/10.7202/037019ar.

———. 1990. "Translating Institutions and 'Idiomatic' Translation." *Meta: Journal des traducteurs* 35 (2): 342–55. https://doi.org/10.7202/003675ar.

———. 2000. "The Workplace Procedures of Professional Translators." In *Benjamins Translation Library*, edited by Andrew Chesterman, Natividad Gallardo San Salvador, and Yves Gambier, 39:39–48. Amsterdam: John Benjamins Publishing Company. https://doi.org/10.1075/btl.39.07mos.

———. 2006. "From Culture to Business: Federal Government Translation in Canada." *The Translator* 12 (1): 1–27. https://doi.org/10.1080/13556509.2006.10799207.

———. 2014. "Motivation and De-Motivation in a Government Translation Service: A Diary-Based Approach." *Perspectives* 22 (4): 581–91. https://doi.org/10.1080/0907676X.2014.948889.

Muñoz Martín, Ricardo. 2010. "On Paradigms and Cognitive Translatology." In *American Translators Association Scholarly Monograph Series*, edited by Gregory M. Shreve and Erik Angelone, XV:169–87. Amsterdam: John Benjamins Publishing Company. https://doi.org/10.1075/ata.xv.10mun.

Nee, Victor. 1998. "Sources of the New Institutionalism." In *The New Institutionalism in Sociology*, by Mary C. Brinton and Victor Nee, 1–16. New York: Russell Sage Foundation.

Nord, Christiane. 1991. *Text Analysis in Translation: Theory, Methodology, and Didactic Application of a Model for Translation-Oriented Text Analysis*. Amsterdam; Atlanta, GA: Rodopi.

Nováková, Eva. 2019. "Contrastive analysis in translation quality assessment: The case of EU official document translations." *Studie z aplikované lingvistiky* 10 (1): 26–51.

O'Driscoll, Jim. 2001. "Hiding Your Difference: How Non-Global Languages Are Being Marginalised in Everyday Interaction." *Journal of Multilingual and Multicultural Development* 22 (6): 475–90. https://doi.org/10.1080/01434630108666446.

Pich, Hans. 2014. "From EN 15038 to ISO 17100." Presented at the TL Conference 2014, Warsaw. https://www.slideshare.net/HansPich/rws-2014-iso17100tlcwarsawen.

Plassard, Freddie. 2020. "Qualité et Normativité Dans La Traduction Institutionnelle." *Lingue Culture Mediazioni - Languages Cultures Mediation (LCM Journal)* 7 (1): 65–82. https://doi.org/10.7358/lcm-2020-001-plas.

Prieto Ramos, Fernando. 2017. "Global Law as Translated Text: Mapping Institutional Legal Translation." *Tilburg Law Review* 22 (1–2): 185–214. https://doi.org/10.1163/22112596-02201009.

———, ed. 2018. *Institutional Translation for International Governance: Enhancing Quality in Multilingual Legal Communication*. First edition. Bloomsbury Advances in Translation. New York: Bloomsbury Academic, An imprint of Bloomsbury Publishing.

Pym, Anthony. 1992. *Translation and Text Transfer: An Essay on the Principles of Intercultural Communication*. Frankfurt/Main: Lang.

———. 2000. "THE EUROPEAN UNION AND ITS FUTURE LANGUAGES: QUESTIONS FOR LANGUAGE POLICIES AND TRANSLATION THEORIES." *Across Languages and Cultures* 1 (December): 1–17.

———. 2001. "AGAINST PRAISE OF HYBRIDITY." *Across Languages and Cultures* 2 (2): 195–206. https://doi.org/10.1556/Acr.2.2001.2.3.

———. 2004a. "On the Pragmatics of Translating Multilingual Texts." *The Journal of Specialised Translation*, no. 1: 14–28.

———. 2004b. *The Moving Text: Localization, Translation, and Distribution*. Benjamins Translation Library, v. 49. Amsterdam; Philadelphia: John Benjamins Pub. Co.

———. 2015. "Translating as Risk Management." *Journal of Pragmatics* 85 (August): 67–80. https://doi.org/10.1016/j.pragma.2015.06.010.

Reiss, Katharina, and Hans J. Vermeer. 2013. *Towards a General Theory of Translational Action: Skopos Theory Explained*. Manchester, UK: St. Jerome Publishing.

Risku, Hanna. 2004. *Translationsmanagement: Interkulturelle Fachkommunikation Im Informationszeitalter*. Translationswissenschaft, Bd. 1. Tübingen: Narr.

Saldanha, Gabriela, and Sharon O'Brien. 2014. *Research Methodologies in Translation Studies*. London: Routledge. https://doi.org/10.4324/9781315760100.

Schäffner, Christina, ed. 1998. *Translation and Quality*. Philadelphia: Multilingual Matters.

Schäffner, Christina, and Beverly Adab. 2001. "THE IDEA OF THE HYBRID TEXT IN TRANSLATION REVISITED." *Across Languages and Cultures* 2 (2): 277–302. https://doi.org/10.1556/Acr.2.2001.2.11.

Schäffner, Christina, Luciana Sabina Tcaciuc, and Wine Tesseur. 2014. "Translation Practices in Political Institutions: A Comparison of National, Supranational, and Non-Governmental Organisations." *Perspectives* 22 (4): 493–510. https://doi.org/10.1080/0907676X.2014.948890.

Scott, W. Richard. 2014. *Institutions and Organizations: Ideas, Interests, and Identities*. Fourth edition. Los Angeles: SAGE.

Searle, John R. 2011. *Speech Acts: An Essay in the Philosophy of Language*. 34th. print. Cambridge: Cambridge Univ. Press.

Snell-Hornby, Mary. 2006. *The Turns of Translation Studies: New Paradigms or Shifting Viewpoints?* Benjamins Translation Library, v. 66. Amsterdam; Philadelphia: J. Benjamins Pub.

Sosoni, Vilelmini. 2011. "Training Translators to Work for the EU Institutions: Luxury or Necessity?" *The Journal of Specialised Translation* 16: 77–108.

Stake, Robert E. 1995. *The Art of Case Study Research*. SAGE.

Stolínová, Barbora. 2015. "Eurožargon v překladových textech vznikajících u institucí EU." Master's thesis, Praha: Univerzita Karlova, Filozofická fakulta, Ústav translatologie. https://dspace.cuni.cz/handle/20.500.11956/73626.

Strandvik, Ingemar. 2017a. "Towards a More Structured Approach to Quality Assurance: DGT's Quality Journey." In *Institutional Translation for International Governance : Enhancing Quality in Multilingual Legal*

Communication, by Fernando Prieto Ramos, 51–62. London: Bloomsbury Methuen Drama. https://doi.org/10.5040/9781474292320.

———. 2017b. "Evaluation Of Outsourced Translations. State Of Play In The European Commission's Directorate-General For Translation (DGT)." In *Quality Aspects in Institutional Translation*, edited by Tomáš Svoboda, Łucja Biel, and Krzysztof Łoboda, 123–38. Translation and Multilingual Natural Language Processing 8. Berlin: Language Science Press. https://doi.org/10.5281/ZENODO.1048194.

Suojanen, Tytti, Kaisa Koskinen, and Tiina Tuominen. 2015. *User-Centered Translation*. Translation Practices Explained. London; New York: Routledge.

Svoboda, Tomáš. 2013. "Translation Manuals and Drafting Style Guides at the European Commission." *Le Bulletin Du CRATIL* 10 (May): 80–106.

———. 2017. "Translation Manuals And Style Guides As Quality Assurance Indicators: The Case Of The European Commission's Directorate-General For Translation." In *Quality Aspects in Institutional Translation*, edited by Tomáš Svoboda, Łucja Biel, and Krzysztof Łoboda, 75–108. Berlin: Language Science Press. https://doi.org/10.5281/ZENODO.1048190.

———, ed. 2019. *Překlady pro EU*. Praha: Milada Karez. https://www.academia.edu/40805298/P%C5%99eklady_pro_EU.

Tcaciuc, Luciana Sabina. 2012. "Translation Practices At The European Central Bank With Reference To Metaphors." Aston University.

Tcaciuc, Luciana Sabina, and Vladislav Mackevic. 2017. "Translators' Agency in Translating Economic Metaphors in European Union Institutions: The Case of the European Central Bank." *Perspectives* 25 (3): 417–33. https://doi.org/10.1080/0907676X.2017.1287205.

Thomas, Gary. 2011. *How to Do Your Case Study: A Guide for Students and Researchers*. Los Angeles, Calif.; London: SAGE.

Toury, Gideon. 2012. *Descriptive Translation Studies--and Beyond*. 2nd expanded ed. Benjamins Translation Library, v. 100. Amsterdam; Philadelphia: John Benjamins Pub. Co.

Trosborg, Anna. 1997. "Translating Hybrid Political Texts." In *Benjamins Translation Library*, edited by Anna Trosborg, 26:145–58. Amsterdam: John Benjamins Publishing Company. https://doi.org/10.1075/btl.26.12tro.

Tuckett, David, Douglas Holmes, Alice Pearson, and Graeme Chaplin. 2020. "Monetary Policy and the Management of Uncertainty: A Narrative Approach." *SSRN Electronic Journal*. https://doi.org/10.2139/ssrn.3627721.

Tyulenev, Sergey. 2016. "Agency and Role." In *Researching Translation and Interpreting*, edited by Claudia Angelelli and Brian James Baer, 17–31. London; New York: Routledge.

Venuti, Lawrence. 1995. *The Translator's Invisibility: A History of Translation*. London; New York: Routledge.

———. 1998. *The Scandals of Translation: Towards an Ethics of Difference*. London; New York: Routledge.

Wagner, Emma, Svend Bech, and Jesús M. Martínez. 2002. *Translating for the European Union Institutions*. St. Jerome Pub.

Yin, Robert K. 2018. *Case Study Research and Applications: Design and Methods*. Sixth edition. Los Angeles: SAGE.

Zehnalová, Jitka. 2015. *Kvalita a hodnocení překladu: modely a aplikace*. Olomouc: Univerzita Palackého v Olomouci.

Sources from EU institutions:

Council Regulation (EU) No 1024/2013 of 15 October 2013 Conferring Specific Tasks on the European Central Bank Concerning Policies Relating to the Prudential Supervision of Credit Institutions. 2013. *OJ L*. Vol. 287. http://data.europa.eu/eli/reg/2013/1024/oj/eng.

Directorate-General for Economic and Financial Affairs, European Commission, and Directorate-General for Communications Networks, Content and Technology. 2020. "Flash Eurobarometer 487: Introduction of the Euro in the Member States That Have Not yet Adopted the Common Currency Report." https://doi.org/10.2765/566056.

Directorate-General for Translation. 2009. *Web Translation as a Genre*. Brussels: European Commission.

———. 2012. *How to Write Clearly*. Luxembourg: Publications Office of the European Union. https://data.europa.eu/doi/10.2782/54318.

———. 2014. "Quality Management Framework." European Commission.

———. 2015. "Translation Quality Guidelines." European Commission.

———. 2021. *Translation in Figures 2021*. Brussels: Publications Office of the European Union. https://data.europa.eu/doi/10.2782/413378.

Draghi, Mario. 2014. "Monetary Policy Communication in Turbulent Times." European Central Bank. April 24, 2014. https://www.ecb.europa.eu/press/key/date/2014/html/sp140424.en.html.

EEC Council Regulation No. 1 Determining the Languages to Be Used by the European Economic Community. 1958. *DD I*. Vol. TOC. http://data.europa.eu/eli/reg/1958/1(1)/oj/eng.

European Central Bank. 2008. "Central Banks and the Public: The Importance of Communication." European Central Bank. November 18, 2008. https://www.ecb.europa.eu/press/key/date/2008/html/sp081118_2.en.html.

———. 2013. "Convergence Report June 2013." Frankfurt am Main.

———. 2015. "ECB, ESCB and the Eurosystem." European Central Bank. June 25, 2015. https://www.ecb.europa.eu/ecb/orga/escb/html/index.en.html.

———. 2017. "Why Is the ECB Independent?" European Central Bank. January 12, 2017. https://www.ecb.europa.eu/explainers/tell-me-more/html/ecb_independent.en.html.

———. n.d. "Information for Contractors – Quality Assessment of External Services." European Central Bank. Accessed January 20, 2021.

European Commission. n.d. "What Is the Economic and Monetary Union? (EMU)." European Commission. n.d. https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/economic-and-monetary-union/what-economic-and-monetary-union-emu_en.

European Union, and European Commission. 2004. *Many Tongues, One Family: Languages in the European Union*. Europe on the Move. Luxembourg: Office for Official Publications of the European Communities.

Eurostat. 2019. "How Many Translators and Interpreters Are in the EU?" ec.europa.eu/Eurostat. 2019. https://ec.europa.eu/eurostat/web/products-eurostat-news/-/EDN-20190930-1.

Scheller, Hanspeter K. 2006. *The European Central Bank: History, Role and Functions*. 2. revised ed. Eurosystem. Frankfurt am Main: European Central Bank.

Analysed source texts (appended to the thesis on a CD):

European Central Bank. 2013a. 'Convergence Report June 2013'. Frankfurt am Main.

———. 2013b. 'Convergence Report June 2014'. https://www.ecb.europa.eu/pub/pdf/conrep/cr201406en.pdf.

———. 2015. 'Feedback on the Input Provided by the European Parliament as Part of Its Resolution on the ECB Annual Report for 2015'.

———. 2016. 'Feedback on the Input Provided by the European Parliament as Part of Its Resolution on the ECB Annual Report for 2016'.

———. 2017. 'Feedback on the Input Provided by the European Parliament as Part of Its Resolution on the ECB Annual Report for 2017'.

———. 2018a. 'Convergence Report May 2018'. https://www.ecb.europa.eu/pub/pdf/conrep/ecb.cr201805.en.pdf.

———. 2018b. 'Feedback on the Input Provided by the European Parliament as Part of Its Resolution on the ECB Annual Report 2018'.

European Court of Auditors. 2014. 'Report on the Audit of the Management by the European Central Bank of Its Carbon Footprint Together with the Replies of the European Central Bank'. Publications Office of the European Union. http://op.europa.eu/en/publication-detail/-/publication/51b5d344-e30c-11e3-8cd4-01aa75ed71a1.

———. 2015. 'EU Supervision of Credit Rating Agencies: Well Established but Not yet Fully Effective. Special Report No 22, 2015'. Publications Office. http://op.europa.eu/en/publication-detail/-/publication/948236b3-a239-4727-80b3-06a943af2dcf.

———. 2016. 'Single Supervisory Mechanism: Good Start but Further Improvements Needed. Special Report No 29, 2016.' LU: Publications Office. https://data.europa.eu/doi/10.2865/023587.

———. 2016b. 'The EU Institutions Can Do More to Facilitate Access to Their Public Procurement. Special Report No 17, 2016'. LU: Publications Office of the European Union. https://data.europa.eu/doi/10.2865/24159.

———. 2018a. 'Office Accommodation of EU Institutions: Some Good Management Practices but Also Various Weaknesses. Special Report No 34, 2018'. LU: Publications Office of the European Union. https://data.europa.eu/doi/10.2865/896619.

———. 2018b. 'The Operational Efficiency of the ECB's Crisis Management for Banks. Special Report No 02, 2018'. LU: Publications Office of the European Union. https://data.europa.eu/doi/10.2865/678227.

LIST OF GRAPHICS

10 ANNEXES

Annex 1: Table of situational characteristics (Biber and Conrad 2009, 45)

Table 2.1 *Situational characteristics of registers and genres*

I. **Participants**
   A. Addressor(s) (i.e. speaker or author)
      1. single / plural / institutional / unidentified
      2. social characteristics: age, education, profession, etc.
   B. Addressees
      1. single / plural / un-enumerated
      2. self / other
   C. Are there on-lookers?
II. **Relations among participants**
   A. Interactiveness
   B. Social roles: relative status or power
   C. Personal relationship: e.g., friends, colleagues, strangers
   D. Shared knowledge: personal and specialist
III. **Channel**
   A. Mode: speech / writing / signing
   B. Specific Medium:
      Permanent: taped / transcribed / printed / handwritten / e-mail / etc.
      Transient speech: face-to-face / telephone / radio / TV / etc.
IV. **Production circumstances:** real time / planned / scripted / revised and edited
V. **Setting**
   A. Is the time and place of communication shared by participants?
   B. Place of communication
      1. Private / public
      2. Specific setting
   C. Time: contemporary, historical time period
VI. **Communicative purposes**
   A. General purposes: narrate / report, describe, exposit / inform / explain, persuade, how-to / procedural, entertain, edify, reveal self
   B. Specific purposes: e.g., summarize information from numerous sources, describe methods, present new research findings, teach moral through personal story
   C. Factuality: factual, opinion, speculative, imaginative
   D. Expression of stance: epistemic, attitudinal, no overt stance
VII. **Topic**
   A. General topical "domain": e.g., domestic, daily activities, business / workplace, science, education / academic, government / legal / politics, religion, sports, art / entertainment, etc.
   B. Specific topic
   C. Social status of person being referred to

Annex II: Categorization scheme