

Date
30 June 2008

Le Président

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des Experts
Comptables
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Mr. Jim Sylph
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Translations@ifac.org

Dear Mr. Sylph,

Re: Consultation Paper: Translation of IFAC Standards

As the representative organisation of the European accountancy profession, FEE is pleased to comment on the Consultation Paper: Translation of IFAC Standards.

As FEE is not directly involved with the translation of standards, our comments are based on discussions with FEE Member Bodies. A significant number of our Member Bodies have been involved with the translation of IFAC Standards over a considerable period of time, some following agreements with IFAC and some without such agreement.

General

Objectives

A number of FEE Member Bodies, so called translating bodies, have existing agreements with IFAC related to translation of IFAC Standards. They might have incurred expenses and entered into contracts with other parties, such as translators, on the basis of these existing agreements.

Therefore, it is proposed IFAC considers grandfathering existing agreements for an appropriate period of time to allow for full execution by translating bodies and apply the new policies to subsequent agreements.

Developing One Quality Translation per Language

FEE Member Bodies agree in principle with the stated policy of IFAC in paragraph 2 to develop one quality translation per language. It is however not clear what "one quality translation per language" means in practice. The following factors might need to be addressed:

- Although different countries might use the same language, often different terms or phrases are used to describe the same or similar concepts;
- There may be significant differences in spelling and some differences in grammar;
- There is a need to address the responsibility and process for regularly updated translations of IFAC standards.

IFAC could usefully provide best practices currently used by translating bodies of different countries developing one translation per language related to:

- How translating bodies from different countries developing one translation can coordinate their efforts;
- How to develop terminology for one quality translation to be used in different jurisdictions around the world;
- The use or addition of some footnotes to (existing) translations, in order to provide for the necessary explanation;
- Scenarios for translating bodies of different countries to join their efforts to arrive at one quality translation, for instance by using principal translators and reviewers.

Translation Process

We believe that the role of IFAC versus the role of translating bodies ought to be governed by the principle of *subsidiarity* – that is, each should be responsible for those matters that can be best conducted at their level, or kind of organization. In this context it is important to consider the costs versus the benefits of performing translations of IFAC Standards. The involvement of IFAC related to translations therefore appears to be best situated on the level of *limited monitoring* of the quality of the translations and *stimulating coordination* between different translating bodies developing one translation per language.

Copyright

The existing agreements between the translating bodies and IFAC allow these bodies to distribute the translated publications for free or at a price not to exceed the costs of translations and the direct costs of publication or distribution.

The current IFAC Consultation Papers states:

- In Paragraph 4 (d) that IFAC may also permit translating bodies to provide the translation to others at a price intended to recover the cost of translation and reproduction.
- In contrast, in paragraph 10 that it is IFAC's policy to make the translated standards electronically available free of charge in a manner similar to the English originals and that therefore, IFAC will "require" the translating body to transfer copyright of the translated standards to IFAC.
- In paragraph 11, that in cases where the text of the translated standards could be incorporated into law (for example following the adoption of ISAs by the European Commission) copyright will be waived. However in other cases the waiving of the copyrights will be considered on a case by case basis.

A number of the FEE Member Bodies do not see the value added nor the public interest of a transfer of copyrights. They prefer the current situation where all relevant translating bodies keep their part of the copyrights, provided that they provide access to the output of the translations to the public at large at no cost. Some FEE Member Bodies are concerned that in case IFAC makes the translations available free of charge, translating bodies would not be able to recoup part or all of that cost of translation, if that is what they desire.

For these reasons, IFAC is invited to reconsider its proposed course of action with respect to copyrights and availability.

Comments on individual paragraphs

Paragraph 6 (b) (ii)

In cases where standards are to be adopted into national law, it is important that a high quality faithful translation exists that governments can draw upon. IFAC should therefore recommend that translating bodies provide faithful translations to any government wishing to adopt the standards and that translation bodies consult with the government in their translation/adoption process. This would help ensure that variances in meaning and application are minimized in that process.

Paragraph 6 (c) (ii)

Related to the requirement that translators use translation memory software recommended by IFAC, it should be noted that this might conflict with European competition legislation. Additionally, many translation bodies have already selected translation software years ago under the existing translation agreement with IFAC. Changing to other software would be very expensive and may involve considerable time.

Paragraph 6 (c) (iii)

We believe that the review of translated standards by the review committee, in addition to focusing on technical accuracy, consistent use of terms etc, should also recognise that the translation will have to be easily readable in the language of translation if the standards are to gain ready acceptance.

Responses to Questions

A. Are the criteria in paragraph 4 complete? Will they assist IFAC in meeting the objectives set out in paragraph 2? If not, how should they be expanded or amended?

Reference is made to our comments on the 'objectives' under 'developing one quality translation per language'.

B. Are any of the criteria too limiting and, as a result, may affect the successful implementation of IFAC's proposal to achieve one quality translation of the standards per language?

Reference is made to our 'general comments' and our comments on 'copyrights'.

C. Are the roles of IFAC staff, the principal translator and the review committee members appropriately defined?

Reference is made to our comments on the 'translation process' under 'developing one quality translation per language'.

D. How should members, associates and other interested parties that may benefit from using the standards in the language of translation (see paragraph 4(a) above) be involved in the translation process?

Reference is made to our 'comments on individual paragraphs'.

E. Do you believe that the proposed process is effective and efficient and will produce quality translations? Based on the experiences of your organization, how can it be enhanced?

Reference is made to our responses to Questions D and F.

F. Do you agree with the proposal in paragraph 9 and the circumstances in which it is to be applied? What other exceptional circumstances may exist?

Reference is made to our general comments and our comments on 'developing one quality translation per language'.

G. How should the translation which has been amended for different terminology be described? Can IFAC have more than one official translation of the standards into the same language?

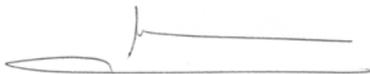
Reference is made to our comments on 'developing one quality translation per language'.

H. Kindly provide any further comments that you may have on the proposals in this paper?

Reference is made to our comments made above.

If you have any further questions about our views on these matters, please do not hesitate to contact us.

Yours sincerely,



Jacques Potdevin
President

Ref.:AUD/JP/HB-SH