

October 4, 2016

The Honourable Judy M. Foote
Minister of Public Services and Procurement
11 Laurier Street
Place du Portage, Phase III Suite 18A1
Gatineau QC
K1A 0S5

Re: Response to the recommendations made in the Report of the Standing Committee on Official Languages (May 2016)

Dear Minister Foote:

The Language Industry Association (AILIA), which represents private translation, interpretation, terminology, language training and language technology companies, would like to thank the House of Commons Standing Committee on Official Languages for allowing AILIA to present its point of view on the role of the Translation Bureau in Canada and on the use of new translation tools. AILIA enthusiastically endorses the Committee's recommendations, but in this letter we are making some recommendations we deem essential to renew the Translation Bureau and allow it to contribute to modernizing the Canadian translation industry.

BACKGROUND

Canada has a large language industry that is based on an infrastructure fuelled by universities, professional associations and business associations. The Translation Bureau has been one of the major architects of the industry. From the many students who interned at the Bureau during their studies who now populate the industry, to the quality standards set by the Bureau over the years that remain the gold standard to this day, or the language technology innovations—such as Portage, Termium and captioning for Parliament, to name a few—the Bureau has contributed much. Furthermore, as a major purchaser of translation services in Canada, the Bureau has helped many companies establish themselves as reliable, robust and high-quality professional service providers.

However, our industry has suffered over the last years with many of our businesses seeing their profit margins being reduced to a non-viable level (back to 1980's rates). Many Canadian owned companies ceased their activities or were bought by foreign companies, in some cases exporting the work and having it done by non- translators or non-Canadian translators.

To reverse that trend, ALLIA proposes to use the buying power of the Canadian government to help build a solid and robust industry that would put Canada back into the forefront of the world language scene, with the Translation Bureau having an essential role. Moreover, ALLIA would like to propose the establishment of two government/industry joint committees: one to work with the Bureau on professional matters (training, quality control, standards, etc.) and the other to oversee the government procurement process for language industry services.

It is ALLIA's hope and expectation that the Bureau will once again become a leader in the translation industry, in terms of its professional expertise and training. We are taking this opportunity to provide our recommendations, in addition to those included in the House of Commons Standing Committee on Official Languages for consideration.

INTERNAL EXPERTISE AND TRAINING

The Translation Bureau has notably given rise to the greatest scientific and technical translation careers and fuelled the private sector with high-calibre specialized resources for companies to not only meet its high quality standards, but also meet the diverse needs of their demanding Canadian clientele. It has helped create university translation programs, supported the development of professional bodies, associations, and promoted the adoption of strict and responsible standards to ensure compliance with official languages legislation and ensure that the best assets possible are available to the Government of Canada and Canadians.

For several years, the Bureau has been unable to continue on this path and has had to work with a reduced and waning workforce. It has stopped hiring and training interns and has relied solely on the private sector for ensuring succession. The translation industry is likely the only sector, where the largest service provider in the country (i.e. the Translation Bureau), does not contribute to training the next generation of professionals.

The Bureau needs to retake its place in that regard, and to accomplish this it must replenish its pool of experienced and specialized linguists. This does not mean that it must do all work internally, but rather that it must support the government, its clients and the private sector by strengthening university programs, working with the industry to bring interns and recent graduates on board, and contributing to the research and development of tools that the industry will use to improve service delivery.

THE FEDERAL GOVERNMENT'S BUYING POWER

The federal government is the largest supplier of translation services in Canada and as such has a profound influence on the translation industry. It should use this power to help Canadian companies solidify their position domestically and compete internationally.

Each federal department currently enters into its own contracts according to its own rules. In fact, these decisions are made by professional buyers, not language professionals. As a result, even though the Request for a Supply Arrangement (RFSA) system has helped with distinguishing companies from individuals and with re-establishing a more level competitive environment, by the same token it also removed language professionals from decision-making. Decisions are now left up to professional buyers, who set stringent requirements, but expect lower and lower prices. In addition, the Canadian government no longer requires that work be done within our country, no checks that the requirements agreed upon in the contract are met, no one confirms the competency of the professionals involved, or inspects the work delivered by said professionals.

Prices have been plummeting for years because poor quality is not penalized by Departments. Only price matters. As a result, service providers that supply sub-standard work only have to come in with the lowest price during the next bidding process to win a new contract. There is no longer any supplier rating system like the Translation Bureau once had.

QUALITY CONTROL AND STANDARDS

Quality is no longer important for the majority of government work; only price matters. This has weakened the industry and allowed inferior companies and unqualified individuals to grow their businesses at the expense of companies and individuals providing high-quality services to their clients.

It is crucial that the Canadian government have an internal organization responsible for checking that government documents published or posted on the Internet or social media meet set quality standards to avoid costly errors, be it incorrect inscriptions on monuments, websites with practically no translated content or a text translated by machine translation that was not revised by a professional. These kinds of errors are costly fiscally in several ways, because the work has to be redone; socially, because often our officially recognized distinct and large society is receiving poorly presented information; and politically, because laws are not being abided by.

AILIA further recommends that the Canadian government applies the *CAN/CGSB-131.10-2008 when dealing with translation companies*. This *Translation Services Standard* can act as a baseline for contracting procedures. By focusing on auditing translation services process, the certification becomes a natural tool for contracting authorities to use when purchasing translation services. AILIA's position is that conformity to an independent certification should be the basis for procurement policy and practices among purchasers of translation services.

CONCLUSION

Our vision is for the Translation Bureau's role to be based not on internally producing large volumes of translations, but rather on monitoring, managing, standardizing and providing quality assurance.

We are convinced that the Translation Bureau can play an enabling role in the translation industry and a structuring role in the entire language industry in Canada. Instead of being bought out by foreign companies, our firms could become buyers and gain international exposure. That is why we believe that it is essential that an advisory committee made up of industry representatives be created to support the Bureau in this transition and help it to achieve these set objectives.

In short, the time is right to revisit the Translation Bureau's pivotal role and modernize service delivery to capitalize on all the expertise available in Canada, and create a force to be reckoned with that does not limit itself to carrying out work, but rather is a key player in setting the standards for the industry.

AILIA is proud to represent Canadian translation industry companies and hopes to be part of this transformation of this key aspect of the official languages policy: **translation**.

Sincerely,



Sharon Steinberg
President

C.C. Hon. Denis Paradis, President of the Standing Committee on Official Languages and MP, Brome-Missisquoi
Mrs. Donna Achimov, Chief Executive Officer, PWGSC
Hon. François Choquette, MP, Drummond, and Critic for Official Languages, NDP
Board of Directors, AILIA, Board of Directors, ACGL

NOTE: L'Association des conseils en gestion linguistique | Comité de valorisation des services langagiers canadiens, through its President Dominique Bohbot, supports AILIA's position and recommendations.