Consumer Protection Labels for Translations

An overview for LSCs and translation publishers
based on ASTM F2575 and ISO 11669

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THE ARGUMENT FOR CONSUMER LABELS IN TRANSLATION

Consumer protection labels are commonly used in many industries, such as food and other consumer products. ASTM F2575-23 Standard Practice for Language Translation has standardized the labels BRT (bilingually reviewed translation) and UMT[1] (unedited machine translation) with two goals: (1) Provide Language Service Companies (LSCs) and translation publishers with a means to be transparent by identifying the origin of their output, and (2) Afford translation consumers some level of risk management.

The importance of BRT and UMT labels is evident when it is noted that over 99% of all translation produced on a given day is raw machine translation (Multilingual Magazine). These labels let the consumer know whether the target output has been checked against the source by a qualified professional for correspondence.

That becomes especially useful in the age of "neural" machine translation and Large Language Models (LLMs) for GenAI translation. Machine translation output can appear very *fluent* in the target language yet be contaminated by *correspondence* errors (i.e. accuracy or terminology) that would be easily detected by a qualified professional translator/linguist during bilingual review of translation output. Details about the method of production and, in the case of BRT, who takes responsibility for the translation, should be associated with a label.

The BRT and UMT labels, according to ASTM F2575-23, should be used by all publishers to ensure translation consumers are aware of the type of output they are consuming. Clearly, an inspection body is needed to ensure publishers use the appropriate labels. Until such a body is in place, the best alternative we have is to describe the method of production that resulted in a translation, and a checklist could be used to guide Publishers in applying labels.

The exchanges surrounding the need and use of labels have sparked yet another discussion: *When is UMT output appropriate?* Opinions vary widely. Many professional translators feel that there are no use cases at all where UMT is appropriate. The only label that is needed is BRT. Or better still, just "translation".

On the other hand, many non-translators who have been swept up by the hype surrounding AI suspect that professional translators are no longer needed. They assume there is no significant difference between human and machine translation, so labels are not needed, and describing use cases is a waste of time.

The labels BRT and UMT emphasize the need for transparency and consumer awareness, and they also spotlight the work of qualified professional translators—the only ones able to validate that output can receive the BRT label.

What follows is a description of an in-between position, compatible with ASTM F2575-23 and ISO 11669 Translation projects — General guidance[2], that assumes the need for both labels. It begins with an explanation of the term "qualified professional" that is crucial to understanding the labels. It continues with a description of methods of production that merit the BRT label and methods of production that should be labeled UMT. It will then present a list

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[1] The term *machine translation* is applied to identify output produced by non-human means, MT or GenAI.

[2] Any data, in any form, taken from ISO 17100, Translation projects – General guidance, is reproduced with the permission of the International Organization for Standardization, ISO. This standard can be obtained from any ISO member and from the website of the ISO Central Secretariat at the following address: *www.iso.org*. Copyright remains with ISO.

of use cases for both labels. The list of methods of production is prefaced by an explanation of the term "use case" compatible with both international standards.

WHO IS A QUALIFIED LANGUAGE PROFESSIONAL?

According to ISO 17100 Translation services — Requirements for translation services, a language professional is qualified if there is documented evidence that they meet at least one of the following requirements in section 3.1.4 (as amended in 2017):

> *a) has obtained a degree in translation, linguistics or language studies or an equivalent degree that includes significant translation training, from a recognized institution of higher education;*
> *b) has obtained a degree in any other field from a recognized institution of higher education and has the equivalent of two years of full-time professional experience in translating;*
> *c) has the equivalent of five years of full-time professional experience in translating.*

ASTM F2575-23 is much more flexible, recognizing that for the vast majority of the languages in the world there is no university-level degree program in translation. It also recognizes that, for many languages, translation will be only part of the language activity of a professional and thus does not insist on the equivalent of five years of full-time translating, which would be twenty years for someone translating quarter time. See section 7.4 of F2575-23 for more details.

An aspect of being a qualified professional is relevant subject matter expertise for the use case.

WHAT IS A USE CASE?

A method of production is selected based on a use case, which is discussed in both ASTM F2575:23 and ISO 11669/2023. The documents were carefully studied, and though they explain the term differently, the consensus is that the intended meaning is the same:

> *Use case is the sum of all parameters that determine how a specific translation project will be handled.*

The understanding is that each use case is unique, though a few may share similarities.

The first mention of use case in ASTM F-2575:23 is sub-item *5.2 Identifying a Use Case.* There it is stated that use case is the same as scenario. It also states that a use case is comprised of **subject field (domain), type of text, topic, audience, and purpose**. An example would be a medical (domain) text, for an educational magazine (type of text), about heart disease (topic), whose target readers are medical students (audience), aiming at attracting them to work in that specialty within medicine (purpose).

The formal definition of use case in ISO 11669 is more vague and is found in sub-item *3.2.7 use case: description of a specific situation in which an output or service can potentially be used.* However, sub-item 5.2 is more detailed and suggests some specific aspects of the use case that are not explicit in ASTM F2575: language & locale, volume, and deadline.

At the ASLING[3] 43rd Translation and Computer Conference, which was held virtually on November 16-17-18/2021, the panel **Unedited (raw) Machine Translation: Strengths and Limitations in Your Use Case** provided a variety of use cases and how raw MT would or would not be appropriate for each.

The panel was moderated by Eleanor Cornelius, at that time she served as vice president on the Council of the International Federation of Translators (FIT), she was also the chairperson of the South African Translator's Institute (SATI), and was an associate professor in the Department of Languages, Cultural Studies and Applied Linguistics at the University of Johannesburg, and Alan Melby, then also a vice-president of the International Federation of Translators (FIT), emeritus professor of linguistics at Brigham Young University (Utah, US).[4]

On the panel were *Guillaume Deneufbourg* from FIT / CBTI-BKVT (Belgian Chamber of Translators and Interpreters), representing translators; *Markus Foti* Head of Machine Translation (MT) at the Directorate-General for Translation at the European Commission (DGT/EC), representing developers, *Chris Jones,* head of the Press Unit for the European committee of the Regions, representing users of MT; *Mary Nurminen*, panelist, from Tampere University, Finland, representing researchers and academia; and *Eva-Maria Tillmann*, head of quality management at OneWord GmbH, Germany, representing translation companies.

A detailed analysis of the transcript of the recording of the ASLING panel is available in appendix A.

METHODS OF PRODUCTION THAT MERIT THE LABEL BRT

1: Human Translation (HT), with or without the use of CAT tools

Here a "qualified professional", as explained above, begins with a source text and creates a target text, drawing on various optional resources, including terminology lookup, translation memory lookup, and machine translation of individual segments. The target text is often checked by a second bilingual professional translator/reviewer for correspondence with the source, and a subject matter expert (if needed).

2: Full PEMT (post-edited machine translation)

Here a complete target text is obtained automatically, using a system designed specifically for translation or using prompts with a large language model. Then, a qualified professional edits the target text, looking back at the source text even if the target text is fluent and cohesive, so that it is "bilingually reviewed".

Thus, the distinction between the role of humans in HT and PEMT is analogous to that of the **author** of an article in a magazine or a chapter in a book vs that of the **editor** who checks an already written text.

METHODS OF PRODUCTION THAT MUST BE LABELED UMT

1: Raw MT

Here a text is automatically translated using a machine, whether it is an NMT (Neural Machine Translation) system or an LLM (Large Language Model) system such as ChatGPT or an older technology, such as SMT (Statistical MT) for a low-resource language pair. No human touches the output before it reaches the "consumer" (end user).

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[3] *The Association of Language and Technology (Asling.org) was founded in June 2014 as an international non-profit association and is registered in the Canton of Geneva, Switzerland.*

[4] *More extensive biographies of all moderators and speakers are available in annex 2.*

2: MT post-processed by a non-qualified human

There are two variations here:

- A human looks only at the target text, without looking back at the source .
- A human who is not a "qualified professional" (perhaps a bilingual assistant with little experience translating) checks for correspondence.

3: No MT and non-qualified human involved

This applies to translations produced by individuals who do not meet the criteria established in ISO 17100 or ASTM F2575 (see above) for a qualified professional. This is common when the required target language is a low-resource language for which PEMT is not a viable option, and no bilingual review by a qualified human takes place. [5]

IS RAW MT USE EVER APPROPRIATE?

The ASLING Panel's findings were very compelling. The scenarios below were taken from panel members' discussions and illustrate situations where the use of MT is either appropriate or acceptable, and those where it should be avoided.

Use Cases Where Raw MT Use Is Appropriate

Raw machine translation use is acceptable in situations where the end user is fully aware that there is a significant potential for mistakes; however, the likelihood of harm from mistakes in low. See examples below.

- When there is neither budget nor time available for paid human translation and the risk is acceptable.
- Social media content for self-consumption.
- Triage of large content by trained MT engine to determine what is to undergo human translation.

Use Cases Where Raw MT Is Not Appropriate

Whenever the use of raw MT results in unfair advantages, unacceptable risks, wrong information, or may subvert the intended message.

In the list of unacceptable risks are included languages with few resources for which gross mistranslations and hallucinations are common. Examples mentioned by Markus Foti: Finnish, Estonian and Hungarian.

The EU can't use raw MT for RFPs (requests for proposal) because it creates an unfair advantage for those companies that can read the original – the issue is that of equality of treatment under EU Law.

Marketing is a field where raw MT specially lends itself to undesirable risks and misunderstandings. The same holds true in diplomatic fields.

Life sciences can greatly benefit from MT, as far as bringing knowledge forward fast, however, that should be cushioned by post-editing to prevent gross errors from being passed along.

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[5] We propose to interpret MT, in this case, as" translation by a *minus-qualified* individual"- minus-qualified translation.

Appendix A

The professionals in the Asling 43 conference panel, identified the following uses of raw MT:

- International agencies and entities use it to provide access to important content with a short shelf-life, such as breaking news and resolutions that must be shared with constituents who do not share a language (pending risk assessment).
- Businesses may use it to gist content sent by prospective clients, which may expose them to risks if they choose to use free MT engines. A good service opportunity to TSPs that can control risk in exposure and quality.
- The absence of a robust budget and rush to obtain information may lead individuals and businesses to use free MT engines, resulting, again, in unwanted risks.
- Individuals may use it casually for gisting social media content, pen-pal exchanges, reading articles online, i.e. low-risk situations where no consequential decisions will be made based on the translation.
- Triage of large content to determine what is to undergo human translation.
- Analysis of website page views to determine what pages in what languages get the most traffic.

The above is not an exhaustive list.

OneWord, an ISO 17100 and 18500 certified TSP, with their client's approval, uses raw MT to expedite their output delivery. OneWord offers data security and data protection. This service is mostly used for corporate texts and emails.

The **European Community** and its many agencies use machine translation in all 24 languages of their member states and for internal use, such as scanning articles to identify those that require closer scrutiny. Timeliness is the main reason MT is used.

EU agencies must meet the Equality of Treatment burden under EU Law and users are made aware through a clickable notice that the material they are perusing was processed through machine translation and not reviewed.

However, the Equality of Treatment burden means that machine translation cannot be used when it results in unfair advantages, undesirable risks, wrong information, or may subvert the intended message. As an example, MT cannot be used for RFPs (requests for proposals), since it creates an unfair advantage for those companies that can access and understand the RFP in its original language.

Situations in which a translation service provider (TSP)/ international agency may approve the use of raw machine translation, subject to risk assessment findings:

TSP	International Agency
When: Limited budget, short turnaround time	**When:** Material has a short shelf-life and/or dissemination has to be immediate (even if material is going to receive human translation treatment afterward); to collect public opinion and allow public participation in certain processes.
TSP roles: 1- Engage language services advisor (LSA) to help clients make a decision; 2- Offer full- and no-post editing services; 3- Deliver the output client requested.	**EU Agency Roles:** 1) Convey to member states, in their own languages, the content of resolutions as quickly as possible; 2) Keep EU Community abreast of developments

	that may impact it. 3) Allow residents of the EU Community to participate in public opinion polls and similar activities.
Why: Clients' employees use online engines with a high risk of data loss, data security, and data protection. OneWord can offer data security and data protection.	**Why:** MT provided the fastest way to satisfy the EU law, however a disclaimer was placed on a button leading to the MT page, i.e., users knew the material might have errors and could check back when human translation was made available. To allow people to participate in issues that directly impact their lives.
Type of Text: Corporate text, emails.	**Type of text:** Metadata for internal use (30 MM/p/y), scanning news articles using keyword search to identify those that are relevant, news and travel advisories related to COVID 19 pandemic (websites).

Regular Users of MT

Mary Nurminen's research on four different contexts showed MT is commonly used in the following situations:

Personal online use:

(1) **When:** looking for excitement, communicating with people from other countries, identifying mentions of one's work online

Why: complement one's life, identify monetary value of said mention

Type of text: emails, news articles, books, academic works, job interviews, news articles interviews

(2) **When:** translation is not available, content with short shelf-life

Why: timeliness

Type of text: news articles, social media content, ecommerce websites

IP/Patent translation:

When: triage of potentially relevant IP and patent materials; depends on the subject-matter knowledge of users to identify relevant material and what requires translation by humans.

Why: industry practice; needed to identify similar inventions, avoid legal issues. The volume of material to be studied in Chinese, Japanese, and Korean, the main languages, is too large and time is at a premium.

Type of Text: Intellectual property, patent, and patent applications

Academia: allows people access to information they would not have been able to access 10-15 years ago.

When: research of material that has not yet been translated in languages researcher can read, identify mentions of one's work online

Why: timeliness, and researchers' knowledge will help filter errors

Type of text: research papers, books, white papers, thesis, etc.

Annex 1

Labels and Their Descriptions

As a reference, here are the descriptions of the labels suggested by ASTM F2575:23

ASTM F2575 LABELS	DESCRIPTION

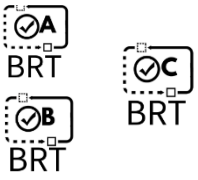
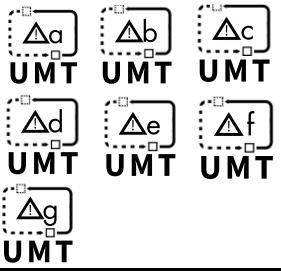
BRT	**Bilingually Reviewed Translation**
	• Full PEMT
	  ○ Complete target text produced from the source text entirely by MT that is edited bilingually by a human translator so that (the output) is fluent and corresponds to the source text by repairing errors produced by the MT.
	• Human Translation w/translation tools
	  ○ Complete target text produced from the source text by a human translator with the assistance of both reference sources and translation-specific tools, such as computer-assisted translation (CAT) tool that includes terminological resources and segment-by-segment suggestions from translation memory and optionally machine translation suggestions, subject to editing or even rejection by the translator.
	• Human Translation w/o using CAT or MT
	  ○ Complete target text produced by a human translator using standard word processing and reference sources, but w/o using translation-specific tools.

UMT	**Unedited Machine Translation** Machine Translation output that is put into use *without any human intervention that involves checking that the source and target texts correspond.* *Comments:* The description provided would include *unedited MT* as well as **(1)** monolingually reviewed translation by a subject matter expert who is not a translator; **(2)** monolingually reviewed translation by a translator who is not a subject matter expert. The restriction is to *human intervention that* involves ***checking that the source and target texts correspond***, which leaves room for the options described above.
ISO 11669 LABELS	DESCRIPTION
UEMT	3.4.3 Unedited Machine Translation Output raw machine translation output output of *machine translation* (3.4.2) that has not been *post-edited* (3.1.8)

- *Table 1*

The above yields a possible checklist to be used by TSPs to inform consumers of how the translation they are using was produced.

Table 2 provides a breakdown of labels and production methods for in-house use. Once the publisher identifies the method of production, one of the checklist items will be added to the final output.

LABEL	MAIN ICON	ELEMENTS	CHECKLIST ITEM	ICONS
BRT		A) PEMT, qBR B) HT, TT, qBR C) HT, qBR	☐ BRTA ☐ BRTB ☐ BRTC	
UMT		a) RMT b) MT, mSMER c) MT, MR d) PEMT, uBR e) HT, TT, uBR f) HT, uBR g) nMT, nqH (or nMT, mt)	☐ UMTa ☐ UMTb ☐ UMTc ☐ UMTd ☐ UMTe ☐ UMTf ☐ UMTg	

- *Table 2*

Legend:

PEMT – Post-Edited MT

HT – Human Translator

BR – Bilingual Reviewer

qBR – qualified Bilingual Reviewer

uBR – unqualified Bilingual Reviewer

TT – Translation Tool

RMT – Raw Machine Translation

MT – Machine Translation

mSMER – monolingual Subject Matter Expert Reviewer

MR – Monolingual Reviewer

nMT – no MT used

nqH – non-qualified Human output

(mt) – minus-qualified human translation

Annex 2

ASLING CONFERENCE PANEL MEMBERS BIOGRAPHIES (with updates)

Asling 43rd Translation and Computer Conference was held in 2021. The panelists at that event continue to grow professionally. Below are their 2021 biographies as they appear on the Asling website, and their current endeavors (2024) are also provided, following the original text.

Eleanor Cornelius (2021) is an associate professor in the Department of Languages, Cultural Studies and Applied Linguistics at the University of Johannesburg. She is the coordinator of the Applied Linguistics cluster/unit in this Department.

She teaches courses in interpreting, psycholinguistics and text-editing at undergraduate level, and courses in psycholinguistics at honors level.

Eleanor is a currently the chairperson of the South African Translators' Institute (SATI) and a SATI accredited simultaneous interpreter in two language directions. She also serves on the Council of the International Federation of Translators (FIT), where she serves on at least five taskforces. She represents not only South Africa, but the entire African continent, on the FIT Council.

She is an invited member of the International Working Group for Community Translation, and she has been a member of the Programme Committee of Asling's Translating and the Computer for a number of years.

She is frequently called up to review articles in scholarly journals, to rate researchers for the South African National Research Foundation, to externally examine master's dissertations and doctoral theses, and also undergraduate and postgraduate courses at other universities.

Eleanor is best known for her research into the concept of plain language, and also her research into legal translation and legal language. In recent years, she has also become more actively involved in machine translation and its relation to, and consequences for, human translation, under the guidance and mentorship of fellow FIT council member, Prof Alan Melby.

2024 update: *Ms. Cornelius is a newly elected vice president of FIT and is still a member of the Programming Committee of Asling's Translating and the Computer, which she has served for a number of years.*

Alan Melby (2021) is a certified French-to-English translator, vice-president of FIT (www.fit-ift.org), emeritus professor of linguistics, and president of LTAC Global

(www.ltacglobal.org) a non-profit serving the translation profession and industry. *For a more extensive bio see **Alan Melby** as Presenter of "Who needs an MQM Scorecard?"*

***2024 update:** Alan has focused on service to the translation profession, previously serving on the governing boards of ATA (https://www.atanet.org/), then FIT (fit-ift.org), and currently (2023) serving as president of LTAC Global (ltacglobal.org), a small non-profit, Chair of FIT North America, and collaborator on the development of translation-related standards.*

Guillaume Deneufbourg (FIT / CBTI-BKVT (Belgian Chamber of Translators and Interpreters)) has been working as a freelance translator since 2002, mainly active as a contractual linguist for the United Nations and in the literary field. He is also a permanent lecturer in translation at the University of Mons (Belgium) since 2010 and a guest lecturer at the University of Lille (France). Since 2019, he brings his experience as a strategy consultant to the translation agency Right Ink, based in Belgium.

Guillaume has published contributions about (machine) translation in various journals during the last 10 years and has given more than 50 lectures and talks around Europe and in the US (notably at the American Translators Association Annual Conferences in San Francisco in 2016 and in New Orleans in 2018).

He was the president of the Belgian Association of Translators and Interpreters from 2016 to 2021) and he still a member of the board, in charge of international relations and FIT.

***2024 update:** Mr. Deneufbourg is a freelance translator, a member of* Association *des Traducteurs Littéraires de France* (ATLF), the *Société Française des Traducteurs* (SFT), the *Société Française de Traductologie* (SoFT), the *American Translators Association* (ATA), and of *Mensa International*.

Markus Foti, Head of the press unit at the European Committee of the Regions (CoR), started as a translator at the European Commission over 20 years ago. After thirteen years in the trenches, he moved to the machine translation team, initially as a liaison between translators and the technical teams. He is now in charge of eTranslation, the Commission's machine translation project and is very keen to provide a tool that can help EU officials and translators deal with the ever-increasing pressure they are under in our fast-moving world.

***2024 update:** Mr. Foti is the current Head of Machine Translation Sector, Directorate General for Translation, at European Commission.*

Chris Jones– A linguist and translator by training, Chris has spent most of his career working in press and communication, firstly as a specialized journalist covering European affairs and latterly as an EU official. After a variety of press and

communication roles in the European Commission, including writing speeches for a Commissioner, and the European Parliament, Chris has recently returned to the place where his EU career first began, the European Committee of the Regions, where he is currently head of unit for press and relations with the media.

2024 update: *Mr. Jones is the current* ***Head of Unit - Press, relations with media, audiovisual at European Committee of the Regions.***

Mary Nurminen teaches translation (human and machine), interpreting and technical writing at Tampere University in Finland, and is finishing up her PhD thesis entitled *Investigating the Influence of Context in the Use and Reception of Raw Machine Translation.* In the early years of her career, Mary found 2 interesting areas – technical communication and localization – and has worked in a number of jobs around those areas. To date (25 years in), the roles include: practitioner, manager, solution architect, teacher and researcher.

2024 update: *Ms. Nurminen is an* ***Assistant Professor at School of Arts and Humanities and Doctoral Student at UL. President of the International and European Associations for Machine Translation. Chair of the Ethics Committee of the Center for Responsible AI.***

Eva-Maria Tillmann is Head of Quality Management and of a project management team at OneWord GmbH, one of the few German TSPs certified to both ISO 17100 and ISO 18587. She is responsible for requirement-oriented process management, optimization and automatization. She has been a member of the ISO Subcommittee for Translation Services since 2019. Eva-Maria is a regular speaker at *tekom (*European Association for Technical Communication*)* events and publishes articles on translation quality, quality assurance and the industry standards. She holds a degree in French and Japanese translation (University of Bonn).

2024 update: *Since 2022, Eva-Maria Tillmann has also been co-project leader of the draft standard ISO AWI 18968 – Translation-oriented writing, an international standards project submitted by DIN based on the German standard DIN 8579 – Translation-oriented writing.*