



WORKING PAPER

ASSEMBLY — 37TH SESSION

EXECUTIVE COMMITTEE

Agenda Item 22: Other high level policy issues to be considered by the Executive Committee

ICAO POLICY ON LANGUAGE SERVICES

(Presented by China, Egypt, the Russian Federation, Saudi Arabia, Tunisia, the United Arab Emirates and Venezuela (Bolivarian Republic of))

EXECUTIVE SUMMARY

This working paper calls the attention of the Assembly and reports about the negative impact of the current ICAO policy on language services, which is aimed at the significant funding reduction for the Language and Publication Branch (LPB) and sets goals for the outsourcing translation up to the 60% (Doc 9895, *Budget of the Organization 2008-2009-2010*). It also proposes actions aimed at restitution of the multilingualism principle within ICAO as a specialized UN Agency.

Action: The Assembly is invited to:

- a) *Reaffirm* that the multilingualism is one of the fundamental principles to achieve goals of ICAO as the specialized UN agency;
- b) *Recognize* that language services are an integral part of any ICAO programme;
- c) *Request* the Council to develop and implement a quality management system in the field of language services; and
- d) *Request* the Secretary General of ICAO, in accordance with the UN practice, to study the possibility of progressive replacement of outsourcing by recruitment of temporary staff at peak periods and to provide that the level of outsourcing translations should not exceed the existing average level of the UN agencies;
- e) *Request* the Secretary General of ICAO to make available for the Human Recourse Committee of the Council on a secured ICAO web-site a roster of the freelancers engaged in language services;
- f) *Request* the ICAO Council to consider the need for amendment of Doc 7231/11, *ICAO Publications Regulations* to provide an unconditional dissemination of ICAO publications in all working languages of ICAO;
- g) *Invite* the Member States representing ICAO working languages, if they so desire, to support ICAO by the establishment of the officially recognized centers for translation ICAO publications and by secondment of the competent staff to ICAO Secretariat, including Regional Offices, in order to reduce backlog and to support special events, provided that the absence of such support from States does not negatively impact the equal treatment of all ICAO working languages;
- h) *Adopt* a new Resolution “ICAO Policy on Language Services” which is superseded Assembly Resolution A31-17 (Attachment).

<i>Strategic Objectives:</i>	The actions proposed are related to all Strategic Objectives.
<i>Financial implications:</i>	More efficient use of the ICAO Regular budget funding allocated to the language services, and improving its quality to the level enabling Contracting States to use the ICAO publications on all ICAO working languages.
<i>References:</i>	UN General Assembly Resolution A/RES/63/306 “Multilingualism” C-WP/13521, C-WP/13366, C-WP/13418 Doc 7231, <i>ICAO Publications Regulations</i> Doc 7515, <i>The ICAO Financial Regulations</i> Doc 9902, <i>Assembly Resolutions in Force (as of 28 September 2007)</i> Doc 9895, <i>Budget of the Organization 2008-2009-2010</i> State Letter A12/3-08/68

1. INTRODUCTION

1.1 Resolution of the General Assembly of the United Nations 63/306 of 9 September 2007, once again stresses the importance of the multilingualism as a means of promoting unity and international understanding. It also emphasizes the paramount importance of the equality of all six official languages of the United Nations.

1.2 By itself the principle of multilingualism in the Organization plays fundamental role enabling the States to meet provisions of Article 37 of the Chicago Convention according to which “...every Contracting State undertakes to collaborate in securing the highest practicable degree of uniformity in regulations, standards, procedures.” Moreover, the use of only one language inhibits the Organization to benefit existing experience of many Member States in the field of civil aviation.

1.3 Assembly Resolution A31-17 reaffirms that parity and quality of service in all working languages of ICAO is the continuous objective of the Organization.

1.4 In practice, under Doc 7231, *ICAO Publications Regulations*, the publications of the Organization are issued “subject to the availability of resources” in all six working languages of the UN. This provision raises the question of the Organization’s priorities when, in the judgment of the management, there is a lack of such resources. For example, in 2010 the Organization discontinued translations of the Vacancy Notices in all ICAO working languages.

1.5 During the last years in the Organization the tendency to translate only into one of the official ICAO languages (English) became evident. It results in issuing a number of documents only in one language (English). In certain cases attachments to the ICAO Council working papers and ICAO State letters were not translated into all ICAO working languages. A number of ICAO events are conducted only in one of the languages (English) without interpretation into other working languages of the Organization. In this connection there is a question if this approach conforms to the principles declared by the UN itself and if translation of the documents into other languages is still one of the Organization’s priorities?

2. FUNDING OF ICAO LANGUAGE SERVICES IN 2008 - 2010

2.1 According to the decisions of the 36th session of the Assembly, the funding for Language and Publication Branch (LPB) in the Doc 9895, *Budget of the Organization 2008-2009-2010* has been significantly reduced. At the same time the goals for outsourcing of translation have been set up to 60% “without compromising quality and timeliness” (Doc 9895). However, in view of the evident problems in language services the Council “... agreed to the contingency plan for language services...” (C-DEC 182/13) whereby “a portion of the resources planned for the termination of the staff would be pooled into a temporary Staff Salary Fund (TSSF)” to retain on a temporary basis 14 language staff posts for different periods of time after the abolishment of their posts and “...to delay the envisaged termination of the remaining 20 staff members” (C-DEC 182/13). Later on, on 27 June 2008, the Council additionally took the decision to allocate for language services the amount of CAD 2,850,000.00 (C-DEC 184/8).

2.2 On the 1st of December, 2008, the Secretary General was compelled to send the letter to the Contacting States asking to provide assistance in eliminating the publications backlog in translation into ICAO working languages. In this letter the Secretary General expressed his concern that “... over the years the diminishing resources for language services have resulted in a large backlog of saleable publications waiting to be translated while these documents are the final results of the Strategic Objective’s programs, mainly in the areas related to safety and security” (State Letter A12/3-08/68).

3. IMPACT OF THE LANGUAGE SERVICES QUALITY DETERIORATION ON THE ORGANIZATION’S ABILITY TO MEET THE OBJECTIVES OF THE CHICAGO CONVENTION

3.1 During the ICAO Council’s discussions several Council Members repeatedly expressed concern about the deterioration of the translation quality of the publications that could have negative effect on safety and security.

3.2 ICAO policy aimed at the language services funding reduction created a number of constraints that resulted in the damage to the ICAO Standards and Recommended Practices (SARPs) development process. For example, now only the introductions and the resolving parts of working papers for the ICAO Panel’s meetings are being translated. As a result, the rationale of proposals to amend the ICAO Standards is not clear. The tasks of the interpreters are becoming more complicated, especially when the complex technical issues are being discussed and new definitions and terms are being introduced and the experts who are not fluent in English are excluded from the preparation of the final documents.

3.3 Besides existing practice of replacement of the Panel’s meetings by Working Group of the whole meetings without translation results in quality deterioration of the amendments being prepared, as some experts are not able to fully participate in the discussions.

3.4 This approach does not allow national experts to take part in scientific revision and editorial of the draft language versions of new or amended SARPs at the stage of their preparation. **As a result, now it is not possible to provide complete translation authenticity of ICAO publications into ICAO working languages.**

3.5 It is to be noted that for a significant number of ICAO Secretariat Members, English is not a mother tongue. Therefore linguistic correctness of the documents prepared by these members in English becomes more and more important for translations into ICAO working languages. It is obvious

that a revision of English versions, including a scientific one, is an integral part of the whole technological process of the Organization's linguistic services.

4. OUTSOURCING OF THE LANGUAGE SERVICES

4.1 During 1980-1992 the level of outsourcing at ICAO was about of 5-10% and in 1993-2007 – 15-20%. For comparison it is to be noted that, according to the resent information, the level of outsourcing among the UN Branches was as follows: UN HQ – 21.8%, Geneva – 19.9%, Vienna – 27.4% and Nairobi – 30.1% (C-WP/13521). During the past years the level of outsourcing at ICAO has reached 40% (and the target was set at 60%).

4.2 According to the studies conducted by ICAO's Secretariat (C-WP/13521) **the only advantage of the language service outsourcing is less cost**. In all other respects the advantages of using in-house staff are evident including a rigorous recruitment process, team work of internal translators, preserving "institutional memory of the Organization, possibility to consult with the originators, editorial staff, terminology staff, etc."

4.3 With outsourcing, ICAO as a customer would no longer have direct control over quality of work of the external translations as a freelancer may, for example, subcontract a document to an unknown third party which does not revise the work. In fact further revision of such document by the in-house translators results in doubling of efforts, time and eventually the costs of language services.

4.4 It is also to be noted that at the UN Headquarters in New York jobs requiring revision are not the subject to outsourcing at all. This work is being done by a regular staff of the Organization. Moreover, if necessary, instead of outsourcing, the Organization recruits translators for the in-house work on the basis of temporary contracts.

4.5 Freelancers may not be available or refuse to do an offered job for different reasons, causing by that potential delays in delivery of the documents. Besides, the confidentiality of the documents to be translated may also be compromised; it is not possible to ensure accuracy and consistency in the use of ICAO terminology which is particularly important for regulatory material. All these questions the authenticity of translations into ICAO working languages performed by the external contractors.

4.6 The above mentioned deficiencies in full extent relate to the outsourcing interpretation. It could be also mentioned that there are some additional disadvantages such as possible last-minute changes in the meeting schedules that may result in the cancellations of the offers of appointments with a freelance interpreter and because of that in eventual penalty payments. Moreover, temporary recruitment of the non-local staff entails extra expenses, such as travel costs, daily subsistence allowance, etc.

4.7 In general, it is possible to come to the conclusion that with a high level of outsourcing ICAO would no longer have a direct control over a considerable portion of its documentation, and the risk of a decline of the quality and timeliness of documents may be seen by the clients as an overall decline in the capacity of the Organization causing the potential tarnish of ICAO's reputation. It should not be forgotten and should be taken into account, while calculating the cost of language services, that only in 2008 the revenues from the ICAO saleable publications amounted to USD 5,042,873.00.

4.8 The statement that the increase of the outsourcing level will lead to the cost reduction should be further analyzed. For instance, according to the existing data the cost of CAEP meeting has

increased 5.25 times against the estimate “... as a result of the present reduced staffing level in the Language and Publications Branch” (C-WP/13366).

4.9 The Budget estimate for the 37th Session of the Assembly has increased from USD 731,000.00 to USD 1,068,000.00. The increase in estimate by 46.1% is due to the reduction in the number of the in-house translators and the in-house interpreters by more than 30%, the increase in the daily subsistence allowances for Montreal – by 5%, the increase in travel fares – by 20%, the increase of the freelance interpreters'/translators' salaries – by 10% (C-WP/13418).

4.10 It is to be noted that further increase of the outsourcing level of the ICAO publications translation led to the formation of the sustainable aviation translations market with all negative consequences such as inevitable increase of rates for translations (for the past years the cost of translation of 1000 words has increased from \$140 to \$220 US).

4.11 A simple, direct comparison of outsourcing with the in-house translation is not justified and leads to taking the wrong decisions, as it is shown in Section 2 of this paper. At the same time actions to ensure the appropriate quality of the outsourcing translations inevitably involve additional costs which are not taken into consideration while preparing a comparative financial evaluation (such as supplementary informational support; need for an implementation process for selection of the freelancers and their independent qualification evaluation; implementation of a selective quality control system, etc.). It is necessary to underline that outsourcing does not fully account for the notion of authenticity of ICAO publications.

5. THE IMPLEMENTATION OF A QUALITY MANAGEMENT SYSTEM IN LANGUAGE SERVICES

5.1 Despite considerable progress in the field of information technologies, the structure of the ICAO Language and Publications Branch has remained the same for an extended period of time. In parallel there is a continuous trend in the reduction of the in-house professional translators and revisers while the number of general staff is the same, and on top of their regular every-day work they are being increasingly involved in supporting outsourcing.

5.2 The increase of the outsourced translations, while weakening the core staff is depriving the Organization of the quality control functions needed for the translation of ICAO publications.

5.3 It is evident that the policy aimed at the erosion of language services in the Organization and the exclusion of linguistic services from the compulsory elements of ICAO programmes does not conform to the multilingualism principle of the UN system and undermines the fundamental principles of ICAO's existence as an International Organization.

5.4 The objective of this paper is to attract the Assembly's attention to the urgent need for the revision of ICAO policy in the field of language services in order to strengthen the core linguistic staff of the Organization, including the full scale implementation of a quality management system in the Language and Publications Branch.

ATTACHMENT
LANGUAGES

Resolution 22-XX: ICAO Policy on the Language services

Whereas the provision and introduction of adequate levels of service in the working languages of ICAO pursuant to the relevant Assembly resolutions and decisions is highly important to the worldwide dissemination of ICAO documentation, in particular the Standards and Recommended Practices (SARPs), and to the proper functioning of the Organization and its standing bodies; and

Whereas it is essential to maintain parity and quality of service in all working languages of the Organization; and

Whereas it is vitally important to ensure a unified and harmonized understanding of ICAO Publications by all Contracting States in all ICAO working Languages, in order to maintain the Safety and Security of international civil aviation and to improve the impact of aviation on the environment;

The Assembly:

1. *Reaffirms* that multilingualism is one of the fundamental principles to achieve goals of ICAO as the specialized UN agency;
2. *Reaffirms* its previous resolutions regarding the strengthening of the working languages of ICAO;
3. *Recognizes* that language services are an integral part of any ICAO programmes;
4. *Resolves* that parity and quality of service in all working languages of ICAO be the continuous objective of the Organization;
5. *Resolves* that the introduction of a new language should not affect the quality of service in the other working languages of the Organization;
6. *Resolves* that the Council continue to monitor language services, which will be a subject of review; and
7. ~~*Requests* the Council to present a report to the next ordinary session of the Assembly in 1998~~ the Council to develop and implement a quality management system in the field of language services; and
8. *Requests* the Secretary General of ICAO to adhere to UN practice related to the language services, including temporary recruitment of staff at peak periods and the level of outsourcing translations and interpretation;
9. *Requests* the Council to consider the need for amendment of Doc 7231, *ICAO Publications Regulations* to provide an unconditional dissemination of ICAO publications in all working languages of ICAO;
10. *Invites* the Member States representing ICAO working languages, if they so desire, to support ICAO by the establishment of the officially recognized centers for translation ICAO publications and by secondment of the competent staff to ICAO Secretariat, including Regional Offices, in order to reduce backlog and to support special events;
11. *Declares* that this Resolution supersedes Assembly Resolution A31-17.