# Consumer Protection Labels for Translations (v7f)

An overview for language service companies and translation publishers
based on ASTM F2575 and ISO 11669

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The latest ASTM translation standard instituted the labels BRT (bilingually reviewed translation) and UMT (unedited machine translation), which function as a type of consumer protection. They are not yet legally required, but we see their use as a matter of ethics. An end user can determine whether a target text is readable but typically cannot determine whether it fully corresponds to the source text. Only qualified language professionals can reliably check correspondence. Thus, it is unethical to publish a translation that has not been bilingually reviewed by a qualified language professional without at least adding an informative label.

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## THE ARGUMENT FOR CONSUMER LABELS IN TRANSLATION

Consumer protection labels are used in many industries, such as those providing food, cosmetics, pesticides, 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 all 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 labels is evident when it is noted that over 99% of all translation produced on a given day is raw machine translation (Multilingual Magazine). The labels BRT and UMT let the consumer know whether the target language output has been checked against the source by a qualified professional for correspondence.

That becomes especially useful in the age of "neural" machine translation (NMT) 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 errors) that would be easily detected by a qualified language professional during bilingual review of a translation. 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 labels BRT and UMT, according to ASTM F2575-23, should be used by all publishers to ensure translation end users are aware of the type of output they are "consuming". Until an inspection body is in place, the best option we have is to ask publishers to voluntarily describe the method of production that resulted in a translation.

The exchanges surrounding the need and use of labels have sparked yet another discussion: *When is UMT output appropriate?* Opinions vary widely. Some professional translators feel that there are no use cases at all where UMT is appropriate, so labels are not needed.

On the other hand, many non-translators who have been swept up by the hype surrounding AI believe 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 11669/2024 Translation projects — General guidance, that assumes the need for both labels. It begins with an explanation of the term "qualified language professional" that is crucial to understanding the labels and continues with a discussion of use cases, to show that both labels are needed, and a spectrum of methods of production as they relate to the labels.

The bottom line is that using the standardized labels BRT and UMT is a win-win. LSCs that provide BRT avoid unfair competition with UMT. Publishers avoid liability by being transparent about what is made available to consumers of translation output. Consumers can make informed decisions by avoiding UMT when errors could cause unacceptable harm.

[1] The term *machine translation* here applies to any output produced by non-human means, e.g. NMT or GenAI.

## WHO IS A QUALIFIED LANGUAGE PROFESSIONAL?

According to ISO 17100 Translation services — Requirements for translation services[2], 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.

Within the Labels project, a language professional can qualify under ISO 17100 or ASTM F2575, so long as they possess the relevant subject matter expertise needed for the use case.

## USE CASES FOR RAW MT; LABELS FOR METHODS OF PRODUCTION

So far, we have not explained the term use case, which is found in both ASTM F2575:23 and ISO 11669/2024. The two standards were carefully studied, and though they explain the term somewhat differently, we concluded that the following description applies to both:

> *A use case is the set of parameters applied to a specific translation project*

The understanding is that each use case is unique, though they often 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 the parameters **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 additional parameters that are not explicit in ASTM F2575: language & locale, volume, and deadline.

[2] The text in this document that has been 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 organization and from the website of the ISO Central Secretariat at the following address: *www.iso.org*. Copyright remains with ISO.

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. This should be helpful when interacting with people who find raw MT unproblematic and those who claim it is never appropriate.

The prestigious panel was moderated by Eleanor Cornelius and Alan Melby, who at that time both served as vice presidents of the International Federation of Translators (FIT).[4]

On the panel were *Guillaume Deneufbourg* from 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 upon request. The scenarios below were taken from the panel discussion and illustrate situations where the use of MT is either appropriate or acceptable, and situations where it should be avoided.

## Use Cases from AsLing 2021 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, especially correspondence errors; however, the likelihood of harm from mistakes is low. See examples below. They are not exhaustive.

- When there is neither budget nor time available for paid human translation and the risk associated with correspondence errors is acceptable.
- Social media content for self-consumption, especially when interaction for clarification is an option before substantive action is taken.
- Triage of large amounts of content produced by a trained MT engine to determine what is to undergo human translation.

## Use Cases from AsLing 2021 Where Raw MT Is Not Appropriate

Whenever the use of raw MT results in unfair advantages or unacceptable risks, such as wrong information that could result in substantive harmful decisions

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 (European Union) can't use raw MT for calls for tender, called RFPs (requests for proposal) in the USA, 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 involves undesirable risks and likely misunderstandings. The same holds true in diplomatic fields. In the life sciences, post-editing is needed.

[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 on the AsLing website.*

Now that we have explained the term "use case" as it appears in ISO 11669 and ASTM F2575 and we have used the AsLing panel as evidence that there are valid use cases for raw MT, we can provide guidance on how to assign the standardized labels, based on method of production, which is in turn based on use case.

## 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/reviser/reviewer for correspondence with the source, and a subject matter expert (if needed).

2: Full PEMT (post-editing of a full text produced by MT)

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 as needed, 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 in full PEMT is analogous to the distinction between the role of the **author** of an article in a magazine or a chapter in a book and the role of an **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). No human touches the output before it reaches the "consumer" (end user).

2: MT that has not been checked for correspondence by a qualified professional

There are two variations here:

- A human, who can be a qualified language professional or a non-qualified professional, looks only at the target text, without looking back at the source and thus cannot detect all correspondence errors.
- A human who is not a qualified professional (perhaps a bilingual assistant with little experience translating) does check for correspondence. Clearly, this can be useful, but the consumer deserves to know whether a qualified professional has been involved.

3: Human translation produced entirely by a non-qualified human, that is, without using MT

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 for low-resource language combinations when neither a viable MT system nor a qualified language professional is available.[5] This method of production can be essential but should be labeled.

## Conclusion: The labels BRT and UMT protect consumers by providing transparency.

[5] We propose to interpret the "MT" component of UMT, in this case, as" translation by a *minus-qualified* individual", thus, **M**inus-qualified **T**ranslation (MT), with no machine translation involved.

# Appendix A (more about the AsLing panel discussion)

The AsLing 43 (November 2021) panelists discussed use cases for raw MT at great length. An important observation was the following:

- In the absence of a robust budget and when there is a rush to obtain information, some individuals or organizations use free MT engines, resulting in unwanted risks such as data security issues, in addition to potential translation errors.

For those who want more detail about the panel discussion than what is found in this document, a recording of the panel discussion is available on the AsLing website ( https://www.asling.org/tc43/videos/Day1-PANEL-Cornelius-Melby.mp4 ).

# Annex 1 (more about the labels BRT and UMT)

**Labels and Their Descriptions in ASTM F2575 and ISO 11669**

As a reference, here are the descriptions of the labels found in ASTM F2575:23 (BRT and UMT), followed by a description of the one label found in ISO 11669-2024 (UEMT).

| ASTM F2575<br>LABELS | DESCRIPTION<br>Note: In the context of the entire standard, it is obvious that the human translator must be qualified. |
|---|---|
| BRT | **Bilingually Reviewed Translation**<br>• Full PEMT<br>  ○ 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.<br>• Human Translation w/translation tools<br>  ○ 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.<br>• Human Translation w/o using CAT or MT<br>  ○ 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**<br>Machine Translation output that is put into use *without any human intervention that involves checking that the source and target texts correspond.*<br><br>*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<br>LABELS | DESCRIPTION IN 11669 |
| UEMT | 3.4.3 Unedited Machine Translation Output<br>raw machine translation output<br>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. Table 2 introduces possible icons that are open to discussion and modification.

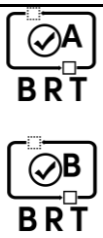
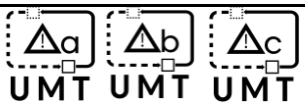
| LABEL | MAIN ICON | ELEMENTS | CHECKLIST ITEM | ICONS |
|---|---|---|---|---|
| BRT |  | A) HT with qBR<br>B) PEMT, qBR | ☐ BRTA<br>☐ BRTB |  |
| UMT |  | a) RMT<br>b) MT without bilingual review by a qBR<br>c) HT, where the human is not a qBR | ☐ UMTa<br>☐ UMTb<br>☐ UMTc |  |

**Table 2 Legend:** PEMT – Post-Edited MT; HT – Human Translation; qBR – qualified Bilingual Reviewer; RMT – Raw Machine Translation

# Contact us!

Comments on this document are welcome. We are also looking for additional team members who are willing to help us promote implementation of the labels BRT and UMT.

Please visit the TranQuality website (tranquality.info) and leave a comment on the blog entry about labels by navigating to the TQ blog or going directly to the recent blog post about labels ( https://www.tranquality.info/labels-in-translation-a-matter-of-ethics/ ). Gio Lester moderates the TQ blog.

You can also contact Alan Melby directly ( alan.melby@fit-ift.org ). During May 2024, he represented FIT (the International Federation of Translators) at the GALA conference in Valencia, Spain. Part of his mission was to introduce the notion of Labels and get feedback. Please put "Labels:" at the beginning of the subject line of your email.